

10/23/85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

-----X  
: IN THE MATTER OF :  
: :  
: :  
: :  
: INMAR ASSOCIATES, INC. : ADMINISTRATIVE ORDER  
: :  
: :  
: Index No. II CERCLA-50115  
: :  
: Respondent, :  
: :  
: Proceeding Under Section 106(a) :  
: of the Comprehensive Environmental :  
: Response, Compensation and Liability: :  
: Act (42 U.S.C. §9606(a)) :  
: :  
: :  
-----X

JURISDICTION

This Order is issued to Inmar Associates, Inc. ("Respondent") by the United States Environmental Protection Agency (EPA) pursuant to the authority vested in the President of the United States by §106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606(a), which authority was delegated to the Administrator of EPA by Executive Order 12316, 46 Fed. Reg. 42237 (August 20, 1981), and duly redelegated to the Regional Administrator, EPA Region II on March 17, 1983. Pursuant to Section 106(a) of CERCLA, the State of New Jersey Department of Environmental Protection (NJDEP) has been notified of this Order.

FINDINGS

1. Respondent is a person, as defined in §101(21) of CERCLA, 42 U.S.C. §9601(21), and the owner of the facility which is the subject of this Order, and thus a responsible party under Section 107(a) of CERCLA, 42 U.S.C. §9607(a).
2. The hazardous substances referred to in this Order shall mean any substances meeting the definition of "Hazardous Substance" as defined in §101(14) of CERCLA, 42 U.S.C. §9601(14).
3. Respondent is a corporation, organized under the laws of the State of New Jersey and doing business in the State of New Jersey, which owns a parcel of property in Carlstadt, Bergen County, New Jersey. The property ("the Inmar Property") is bordered on the north by Peach Island Creek, a surface water of

246702



the United States, on the south by Paterson Plank Road, on the west by Gotham Parkway, and on the east by Carolina Trucking Company. The property consists of Block 124, Lots 1 through 5, Township of Carlstadt (See Figure 1, attached).

4. During the period commencing in or about 1970 and continuing until in or about 1980, the Inmar property was leased by Scientific Chemical Processing, Inc., which operated on the property a waste collection, transportation, treatment and disposal service. The property leased by Respondent to Scientific Chemical Processing, Inc. constitutes a "Facility," as that term is defined in §101(9) of CERCLA, 42 U.S.C. §9601(9). The property to which this Order pertains shall hereinafter be referred to as "the site" or "the facility."

5. During the period of its operation, Scientific Chemical Processing, Inc. accepted and transported for transfer, storage, reprocessing, reclamation, blending, treatment, and for ultimate disposal, through abandonment at the site, materials including, but not limited to, materials contaminated by polychlorinated biphenyls (PCBs), oil and oil sludges, emulsions, acids, mixed solvents, and paint and pigment residues, most of which contained hazardous substances.

6. Respondent owned the facility at which these hazardous substances were accepted for transfer, storage, reprocessing, reclamation, blending, treatment and/or disposal.

7. Inspections performed at the site by the NJDEP and EPA between 1977 and 1984, sampling and chemical analyses, and environmental surveys conducted at the site have indicated that the material which has been released, or threatens to be released, into the environment from spills and/or leaking containers at the site, contained hazardous substances, and that surface water, groundwater, air and soil at the site have been or threaten to be contaminated.

8. Specifically, a NJDEP site inspection report dated October 10, 1980 indicates that based on a June 1980 inventory of waste at the site, the following wastes and/or constituents of waste were released or threatened to be released from the site: benzene, chloroform, trichloroethylene, toluene, styrene, xylene, arsenic, mixed solvents, paint sludge and solvent sludge.

9. Based on the aforementioned inspections, sampling and chemical analyses, and environmental surveys, the New Jersey Supreme Court ordered in October 1980 that Scientific Chemical Processing, Inc. cease operations due to uncontrolled spills and leaks at the site.

10. At that time, there were approximately 56 tanks and/or tank trailers and 50 drums containing hazardous substances at the site. The structural integrity of the tanks and tank trailers was highly questionable. Many were severely discolored, indica-

ting leaks, and some of the tanks had makeshift patches.

11. According to an Inventory prepared by Scientific Chemical Processing, Inc., in December 1980, various wastes containing hazardous substances still remained at the site, including, but not limited to, solvents and thinners, etching solutions, methanol/phosphoric acid solutions, sodium sulfate solutions, and fuel residues.

12. On May 5, 1983, a Verified Complaint and Order to Show Cause was filed by the NJDEP with Judge Reginald Stanton, Superior Court of New Jersey, the Chancery Division for Essex County, seeking the clean-up of the site. In the complaint, the Respondent was named as a defendant. On May 27, 1983 Judge Stanton made a finding that Respondent, as owner of the site, had an inherent obligation to keep the property safe and, consequently, was responsible, inter alios, for the clean-up of the site. On June 16, 1983, the Court ordered that a plan for the clean-up of the site be submitted by July 1, 1983.

13. During 1984, Respondent, under NJDEP supervision, removed from the site approximately 51 tanks and tank trailers, and approximately 50 drums, all containing hazardous substances. However, Respondent has failed to complete the clean-up work pursuant to the approved plan and the aforementioned Court Order (Docket No. C-1852-83E).

14. Presently, there are 4 tanks and 1 tank trailer remaining at the site. Lab analyses performed for Respondent indicate that the liquids, solids, and/or sludges in these tanks/tank trailer contain PCBs; these analyses showed PCB concentrations ranging as high as 91,000 parts per million (ppm) in one sample of sludge. One of the tanks shows evidence of leakage, and another tank has a half-inch wide section cut from its circumference at a height of approximately four feet above the ground. The lids on both of these tanks currently are open to the environment, enabling rainwater to come into contact with the PCB-containing liquids, solids, and/or sludges. There is an inadequate containment system in place around the tanks.

15. PCBs are regulated under the Toxic Substances Control Act (TSCA), 15 U.S.C. §2601 et. seq. Respondent, a "person" within the meaning of 40 CFR §761.3, owns a facility where PCBs (as that term is defined at 40 CFR §761.3) are stored, and is subject to the PCB regulations, 40 CFR Part 761, which were promulgated pursuant to Section 6(e) of TSCA. Pursuant to 40 CFR §761.65(a) any PCB article or PCB container stored for disposal before January 1, 1983 is required to be removed from storage and disposed of pursuant to 40 CFR Part 761 by January 1, 1984. The tanks and trailer mentioned in paragraph 14, above, are "PCB Containers" as defined by 40 CFR §761.3. The PCBs contained in the tanks and trailer were stored for disposal before January 1, 1983. Therefore, the storage of PCBs in the tanks and trailer

constitutes a failure or refusal to comply with 40 CFR §761.65(a), which is a violation of Section 15(1)(C) of TSCA.

16. PCBs have been demonstrated to cause cancer in animals and are suspected human carcinogens. PCBs can cause liver damage, and dermatological abnormalities such as chloracne and hyperpigmentation. PCBs bioaccumulate, i.e., are retained in human and animal tissues at concentrations in excess of exposure levels. PCBs are extremely stable and persistent in the environment.

17. Analyses of waste samples during 1979 showed the following hazardous substances to be present at the site: benzene, carbon tetrachloride, chloroethane, chloroform, ethylbenzene, ethylacetate, isopropanol, methylene chloride, methyl ethyl ketone, methyl isobutyl ketone, phenolic resin, styrene, tetrachloroethane, tetrachloroethylene, toluene, trichloroethane, trichloroethylene, and xylene.

18. The substances listed in paragraph 8, 11, and 17, above, have been shown to cause a variety of adverse effects to exposed populations. For example, benzene exposure has been closely linked to leukemia in humans, and may also be mutagenic. Carbon tetrachloride, chloroform and tetrachloroethylene cause cancer in animals, are suspected human carcinogens, and can cause liver and kidney damage. Ethylbenzene and xylenes can adversely effect the central nervous system, causing dizziness, unconsciousness, and death due to respiratory failure.

19. The presence of such hazardous substances at the site, and their past and/or potential future migration to surrounding soils, surface water, and groundwater, constitute an actual release or threatened release within the meaning of Section 101(22) of CERCLA, 42 U.S.C. §6901(22).

20. Based on present information, the site is located on a filled-in section of the Hackensack Meadows. The fill, which consists of organic silt, is underlain by clay deposits interspersed with beds of sand and gravel. These clay deposits, and sand and gravel beds are believed to be discontinuous and may not comprise a major confining unit. The bedrock at the site is the Brunswick Formation, which underlies the clay, sand and gravel deposits at depths ranging from approximately 40 to 120 feet in the vicinity of the site.

21. The two major aquifers in the area of the site are the Brunswick Formation and the Quarternary age stratified drift located along river channels. The Brunswick Formation yields water from fractures in the rock. Fracturing decreases with depth, and most of the groundwater is produced by the upper, highly fractured part of the formation.

22. There are approximately 21,000 people living within three miles of the site. The primary water supply for this population is groundwater. The nearest well is located about 4000 feet from the site.

23. The hydrogeologic conditions described in paragraphs 20 and 21 constitute conditions which may enhance the vertical transmission of hazardous substances in the groundwater. Groundwater contamination may pose a threat to local populations who utilize this water for drinking purposes.

24. Peach Island Creek borders the site on the north. This creek has been designated as Freshwater-2 (FW-2) by NJDEP. FW-2 criteria state that such waters should "be suitable for maintenance, migration, and propagation of the natural ecosystem and support biota." Peach Island Creek joins Berrys Creek Canal approximately 1500 feet northwest of the site. Berrys Creek Canal joins the Hackensack River approximately 2 miles downstream of its confluence with Peach Island Creek. According to NJDEP, designated uses for Berrys Creek and the Hackensack River include "secondary contact recreation; the maintenance and migration of fish populations; the migration of diadromous fish; the maintenance of wildlife and other reasonable uses." The Hackensack River enters the Atlantic Ocean in the Newark Bay approximately 7 miles south of the site. Contamination of Peach Island Creek would pose a threat of contamination to these other navigable waters.

25. Visual observations of spills into Peach Island Creek noted during past site inspections indicate possible contamination of surface water, creek sediment, soil and groundwater.

26. The site is on the National Priorities List ("NPL"), 40 CFR Part 300, Appendix B, which has been issued pursuant to Section 105(8)(b) of CERCLA, 42 U.S.C. §9605(8)(b).

27. On September 23, 1985, Respondent's attorney met with EPA representatives to discuss Respondent undertaking the work set forth herein pursuant to a proposed Administrative Order on Consent. By letter dated September 30, 1985, Respondent declined to consent to said Order.

#### DETERMINATION BY THE REGIONAL ADMINISTRATOR

28. Based on the above Findings, and the entirety of the Administrative Record, and pursuant to Section 106(a) of CERCLA, the Regional Administrator has determined that the release and threatened release of one or more hazardous substances from the facility may present an imminent and substantial endangerment to the public health, welfare and the environment.

ORDER

29. Based on the foregoing FINDINGS AND DETERMINATION, IT IS HEREBY ORDERED that to protect the public health, welfare and the environment, it is necessary that certain actions be taken to abate the release and threat of release of hazardous substances at and from the facility into the environment. Respondent shall undertake corrective actions at the facility in accordance with the directives and schedule specified below. All activities set forth below shall be initiated and completed as soon as possible even though maximum time periods for their completion are specified herein.

Description of Work

30. Within fourteen (14) calendar days of the effective date of this Order, Respondent shall submit to EPA a Detailed Work Plan with respect to accomplishing the following:

- a. Proper off-site disposition of the tanks and trailer referred to in paragraph 14 above, and their contents.
- b. Excavation and proper off-site disposal of any and all visibly contaminated soils and other visibly contaminated materials which may result or have resulted from the release of hazardous substances from the tanks and trailer referred to in paragraph 14 above.

The Detailed Work Plan shall include, but should not necessarily be limited to, the following:

- i. a detailed time schedule for performance of the specific tasks set forth in this Order and a detailed description of how these tasks will be accomplished,
- ii. a map or sketch depicting all sampling locations and the number and types of samples to be obtained at each sampling location,
- iii. the overall site operations plan for performance of tasks specified in this Order, including identification of contractors and subcontractors and their respective responsibilities,
- iv. a health and safety plan, and
- v. a contingency plan for conducting site activities.

Submittal of the Detailed Work Plan shall be made to the Regional Administrator, EPA Region II, with copies sent to the OSC and to the Chief, Site Investigation and Compliance Branch, Emergency and Remedial Response Division, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278, Attention: Ms. Janet Feldstein, Environmental Engineer.

31. EPA will review the Detailed Work Plan and comment thereon in writing. Within 3 business days of receipt of EPA's comments, Respondents will have an opportunity to meet with EPA to discuss such comments before they become final. Within 5 business days of receipt of the final EPA comments, Respondents shall commence implementation of the work plan as amended by such final comments (hereinafter, the EPA-approved work plan). The EPA-approved work plan shall be deemed incorporated into this Order.

32. The contents of the tanks and trailer referred to in paragraph 14 shall be sampled and analyzed to characterize the material for proper handling and disposal. Where inspection of these contents reveals several phases to be present (e.g., sludge, aqueous, oil), each phase shall be sampled individually.

33. Visibly contaminated soil shall be sampled and analyzed as in paragraph 32, above. Final determination of what constitutes visibly contaminated soil will be made by the On-Scene Coordinator.

34. All work pursuant to this Order shall be completed as soon as possible but in no event later than two months after the commencement of work under the EPA-approved work plan unless specifically approved by EPA in writing.

Designated Coordinator, On-Scene Coordinator, Other Personnel,  
and Modifications to EPA-Approved Work Plan

35. Not later than one (1) business day after the effective date of this Order, Respondent shall select a coordinator, to be known as the Designated Coordinator, and shall submit the name, address, and telephone number of the Designated Coordinator to the EPA On-Scene Coordinator. The Designated Coordinator shall be responsible for oversight of the implementation of this Order. All EPA correspondence to the Respondent shall be sent to the Designated Coordinator, with a copy to one other person designated by the Respondent. The name, address, and telephone number of the current EPA Region II On-Scene Coordinator is: (to be designated) EPA will notify the Designated Coordinator if EPA's On Scene Coordinator should change.

36. All activities required of Respondent under the terms of this Order shall be performed only by well-qualified persons possessing all necessary permits, licenses, and other authorizations required by federal, state, and local governments.

37. In the event of an inability or anticipated inability on the part of Respondent to perform or to timely perform any of the activities required under the Order, the Designated Coordinator shall immediately inform the EPA of the reason for, and date and length of such inability to perform and the actions taken or to be taken by Respondent to avoid or mitigate the impact of such inability to perform, including the proposed schedule for such actions.

38. As appropriate during the course of implementation of the immediate corrective actions at the Facility, Respondent or Respondent's consultants or contractors, acting through the Designated Coordinator, may confer with the EPA concerning those actions. Based upon new circumstances or new information not in the possession of EPA on the date of this Order, the Designated Coordinator may request, in writing to EPA, approval of a modification of the EPA-approved work plan. If approved by the EPA, such modification shall be implemented immediately by Respondent.

39. In the event of a significant change in conditions at the Facility, the Designated Coordinator shall notify the OSC immediately at the following emergency telephone numbers: 201-548-8730 or 201-321-6670. In the event the EPA determines that the activities performed pursuant to this Order, or significant changes in conditions at the Facility, pose a substantial threat of immediate and significant risk of harm to human life or health or the environment, EPA may direct Respondent to stop further implementation of the corrective actions or to take other and further actions reasonably necessary to abate the threat. This provision is not to be construed so as to limit any rights EPA may have under 40 CFR §300.65 or any other applicable provision of the NCP, or under any other applicable law or regulation.

#### Reporting Requirements

40. Respondent shall provide written weekly progress reports to EPA with respect to all actions and activities undertaken pursuant to this Order.

41. All submittals and notifications to EPA pursuant to this Order shall be made in writing to Ms. Janet Feldstein (whose address appeared above in paragraph 30), and the OSC (whose address appeared above in paragraph 35).

#### Access and Availability of Data

42. Unimpeded access to the Facility shall be provided by Respondent to EPA and NJDEP, as well as to their respective representatives, agents, employees, contractors, and consultants. Respondent shall permit such persons to be present on the Facility at any and all times and to observe any and all activities conducted pursuant to this Order. EPA and NJDEP representatives or agents shall also have unimpeded access to any portion of or structure at the Facility.

43. EPA and NJDEP shall have full access to all records, including but not limited to contractual documents, maintained or created by Respondent or their contractors or consultants in connection with implementation of the work under this Order.

44. In addition, all data, information, and records in connection with the implementation of work under this Order, shall, without delay, be available to EPA on request, and all employees of all persons, including contractors, who engage in activity under this Order shall be available to and shall cooperate with the United States and/or EPA. No data, information, or records shall be destroyed for eight years without either the express written approval of EPA or a written offer by the Respondent to provide such material to EPA, followed by EPA's written rejection of that offer.

45. Upon request by the EPA, Respondent shall provide split samples of any material sampled in connection with implementation of this Order.

#### General Provisions

46. This Order shall apply to and be binding upon Respondent and Respondent's officers, directors, employees, agents, servants, receivers, trustees, successors, and assigns and upon all persons, including but not limited to firms, corporations, subsidiaries, contractors, and consultants, acting under or for Respondent.

47. All actions and activities carried out by Respondent pursuant to this Order shall be done in accordance with all applicable federal, state, and local laws, regulations, and requirements.

48. All waste disposal conducted by Respondent pursuant to this Order shall comply with all requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq., the Toxic Substances Control Act (TSCA), 15 U.S.C. §2601 et seq., and all regulations promulgated pursuant thereto, as well as all applicable State laws and regulations.

49. All sampling and analyses for proper handling and disposal shall conform to EPA Quality Assurance/Quality Control and Chain of Custody procedures as directed by the EPA and in conformance with Section 10 and 1.3 of the EPA publication entitled "Test Methods for Evaluating Solid Waste" (SW-846 July, 1982 or as updated).

50. Neither EPA nor the United States, by issuance of this Order, assumes any liability for any injuries or damages to persons or property resulting from acts or omissions by Respondent, or Respondent's employees, agents, contractors, or consultants in carrying out any action or activity pursuant to this Order; nor shall EPA or the United States be held as a party to any contract entered into by Respondent or Respondent's officers, employees,

agents, contractors, or consultants in carrying out any action or activity pursuant to this Order.

51. Nothing herein shall constitute or be construed as a satisfaction or release from liability with respect to any conditions or claims arising as a result of past, current, or future operations, ownership, or use of the Facility by Respondent, Respondent's agents, contractors, lessees, successors, or assigns.

52. Nothing in this Order constitutes a decision on pre-authorization of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. 9611(a)(2).

#### Enforcement

53. Failure of Respondent to expeditiously and completely carry out the terms of this Order may result in EPA taking the required actions unilaterally, pursuant to §104(a)(1) of CERCLA, 42 U.S.C. §9604(a)(1).

54. Violation of this Order as a result of Respondent's failure to comply with any provision herein, including but not limited to any failure to comply with any EPA-approved work plan prepared in compliance herewith, shall be enforceable pursuant to §§106(b) and 113(b) of CERCLA, 42 U.S.C. §§9606(b) and 9613(b). Respondent may also be subject to cost recovery, civil penalties and/or punitive damages of up to three times the amount of any costs incurred by EPA as provided in §§106(b), 107(a), and 107(c)(3) of CERCLA, 42 U.S.C. §§9606(b), 9607(a), and 9607(c)(3), for failure to comply with the terms of this Order. Nothing herein shall preclude EPA from taking any additional enforcement actions, and/or additional actions as it may deem necessary for any purpose, including the prevention or abatement of an imminent and substantial danger to the public health, welfare, or the environment arising from conditions at the Facility and recovery of the costs thereof; nor shall anything herein preclude DEP from taking legal action pursuant to State law.

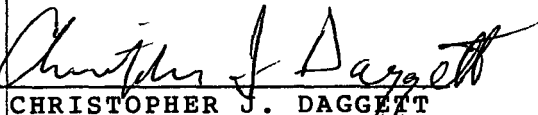
55. Not later than three days from the date this Order is received by Respondent, Respondent may confer with EPA to discuss this Order, including its applicability, the Findings upon which the Order is based, the appropriateness of any action or activity required to be undertaken herein, or any other issues or contentions directly relevant to the issuance of this Order which Respondent may have regarding this Order. Such conference is not, and shall not be deemed to be, an adversary proceeding or part of a proceeding to challenge this Order, and no official stenographic record of such proceeding shall be kept. Should Respondent request a conference under this paragraph, Respondent may appear at such conference in person or by an attorney or other designated representative. Any request for a conference shall be made to Ms. Kathleen Chojnowski, Attorney, Superfund Branch, Office of Regional Counsel, United States Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York, 10278, telephone (212) 264-2211.

Effective Date

55. This Order shall become effective on the fourth working day following the date on which it is received by Respondent.

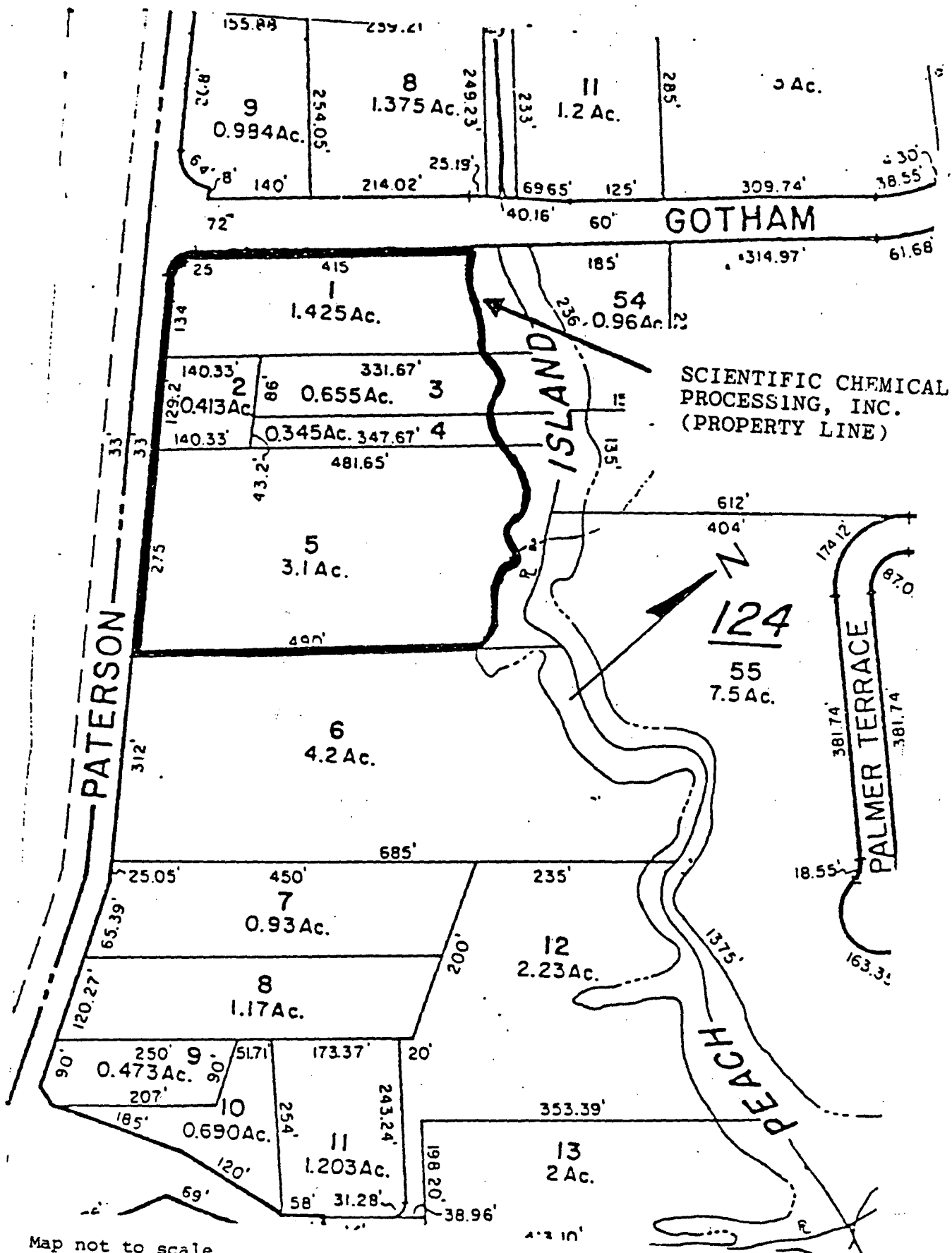
IT IS SO ORDERED:

U.S. ENVIRONMENTAL PROTECTION AGENCY



CHRISTOPHER J. DAGGETT  
Regional Administrator  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

OCTOBER 23, 1985  
Date of Issuance



Map not to scale

Source: NJDEP,

Figure 1

SCP Site at Paterson Plank Road and Gotham Road, Carlstadt Township, Bergen County, New Jersey

T. M. ARMSTRONG ✓

SEP 28 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Ber-Mar, Inc..

COMPANY

Robert T. Gold  
NAME OF OFFICIAL

Vice President

TITLE

September 19, 1985

DATE

718/643-1770 Robert Gold  
212/757-5050 Ira Rose

TELEPHONE NUMBER AND NAME OF

COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

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1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Borden, Inc.

COMPANY

Hxz

A. S. D'Amato  
NAME OF OFFICIAL A.S. D'Amato

President, Borden Chemical Division  
TITLE

September 20, 1985

DATE

Harvey A. Rosenzweig  
(614) 225-4473

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Bowen Engineering, Inc.  
(formerly Stork Bowen Engineering Inc.)

COMPANY

*Richard D. Potts*

NAME OF OFFICIAL -- Richard D. Potts

Controller

TITLE

September 20, 1985

DATE

201-725-3232 Herbert J. Gannon

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Robert M. Carf  
RESPONDENT (Please type name)

\_\_\_\_\_  
Name of Official

9/20/85  
DATE

\_\_\_\_\_  
Title

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

CUSTOM CHEMICALS CO.  
RESPONDENT (Please type name)

ELMWOOD PARK, NJ 07407

Robert C. Viller  
Name of Official

Sept 20 1985  
DATE

PRESIDENT  
Title

**T. M. ARMSTRONG**

**CONSENT**

**SEP 23 1985**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions: ✓

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Dated: September 19, 1985

On behalf of CECOS International, Inc.,  
formerly known as Newco Chemical Waste  
Systems, Inc., and Browning-Ferris  
Industries of Elizabeth, N.J., Inc.

By: CECOS INTERNATIONAL, INC.

By:   
Ramsey G. DiLibero, President

Mailing Address:

2321 Kenmore Avenue  
Buffalo, NY 14207

Telephone Number and Name of  
Company Contact Person:

J. Stephen Buchanan  
Corporate Counsel  
CECOS International, Inc.

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CELLU-CRAFT INC.  
COMPANY

Kenneth David Burrows  
NAME OF OFFICIAL

General Counsel and Secretary  
TITLE

September 23, 1985  
DATE

(516) 775-8000  
John Ayers  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON


T. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Chemcoat  
COMPANY  
  
NAME OF OFFICIAL James M. O'Brien  
President  
TITLE  
9/19/85  
DATE  
717-368-8631  
NADINE P. Pelleschi  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).


3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CHEMICAL DYNAMICS CORPORATION

COMPANY

  
Frank F. Hanna

NAME OF OFFICIAL

Vice President

TITLE

September 18, 1985

DATE

E.O. Lundell, (201) 753-5000

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

SEP 19 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).


3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CHEMICAL DYNAMICS CORPORATION

COMPANY

  
Frank F. Hanna

NAME OF OFFICIAL

Vice President

TITLE

September 18, 1985

DATE

E.O. Lundell, (201) 753-5000

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

I. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CHEMRAY COATINGS CORP  
COMPANY

H. Peter Tepperman  
NAME OF OFFICIAL

President  
TITLE

9/18/85  
DATE

201-245-2600  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

✓  
I. M. ARMSTRONG

CONSENT

SEP 20 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CIBA-GEIGY Corporation

COMPANY

Dr. R. Bernegger  
NAME OF OFFICIAL

Vice President - Safety, Health & Ecology  
TITLE

September 17, 1985  
DATE

914-478-3131 - Patricia Vander Putten  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

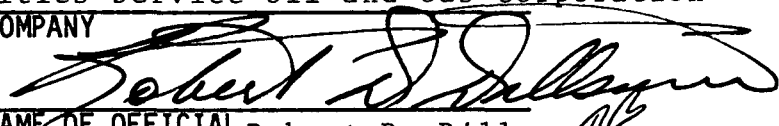
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Cities Service Oil and Gas Corporation  
COMPANY

  
NAME OF OFFICIAL Robert D. Dillsaver

Senior Vice President  
TITLE

September 19, 1985  
DATE

Thomas L. Byers (918) 561-8984  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

### CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Continental Technical Finishes Corp.

COMPANY

Bernard Fleisher

NAME OF OFFICIAL

Secretary

TITLE

September 23, 1985

DATE

Michael J. Comerford, Esq. (212) 759-8770

TELEPHONE NUMBER AND NAME OF

-20-

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

CONVERTERS INK COMPANY

RESPONDENT (Please type name)

*Philip R. Pierro*

Philip R. Pierro  
Name of Official

September 19, 1985  
DATE

Director of Manufacturing  
Title

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AMERICAN CAN COMPANYCOMPANYJOHN HIRSCHAUERNAME OF OFFICIALDIRECTOR, LEGAL ADMINISTRATIONTITLESEPTEMBER 20, 1985DATE203-552-3625TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

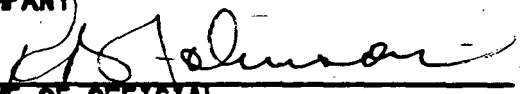
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Cyanamid Company (including  
~~Lederle Laboratories and Shulton Inc.~~)  
COMPANY

  
NAME OF OFFICIAL R. B. Johnson

President, Lederle Laboratories  
TITLE

September 19, 1985  
DATE

Margaret R. Tribble 201-831-3641  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

~~2.~~ It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AMERICAN FLANGE & MANUFACTURING CO, II

COMPANY

NAME OF OFFICIAL

PRESIDENT

TITLE

SEPTEMBER 23, 1985

DATE

ROBERT M. HALLMAN (212) 701-3680

TELEPHONE NUMBER AND NAME OF  
ANY CONTACT PERSON

I. M. ARMSTRONG

SEP 23 1985 ✓

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Hoechst Corporation

COMPANY

Heinz K. Hofmeister  
NAME OF OFFICIAL

Group Vice President

TITLE

September 16, 1985

DATE

Kip C. Lubcke, Esq.  
(201) 231-3089

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

~~American Inks & Coatings Corporation~~  
~~COMPANY~~

  
NAME OF OFFICIAL

President  
TITLE

September 19, 1985  
DATE

215-933-5848 - Mr. Eugene H. Buttle, Pres.  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Standard Inc.

COMPANY

John F. Geer

NAME OF OFFICIAL

Vice President, General Counsel &  
TITLE Secretary

September 19, 1985

DATE

Charles Gordon (212) 703-5147

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Armstrong World Industries, Inc.

COMPANY

NAME OF OFFICIAL

Group Vice-President

Floor Products Operations

TITLE

September 20, 1985

DATE

717/396-2577

David D. Wilson, Attorney

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

✓  
T. M. ARMSTRONG

CONSENT

SEP 20 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Ashland Chemical Company,  
Division of Ashland Oil, Inc.

COMPANY

*SB [Signature]*  
NAME OF OFFICIAL

Administrative Vice President  
TITLE

September 18, 1985  
DATE

Stephen W. Leermakers (606) 268-7434

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AT&T TECHNOLOGIES, INC.

COMPANY

D. R. Chittick  
NAME OF OFFICIAL D. R. CHITTICK

ENGINEERING VICE PRESIDENT  
TITLE

09/20/85  
DATE

(201) 953-5230 JOHN A. MCKINNEY, JR.

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

RASF WYANDOTTE CORPORATION  
COMPANY

DAVID P. SCHNEIDER  
NAME OF OFFICIAL

ATTORNEY  
TITLE

SEPTEMBER 23, 1985  
DATE

DAVID P. SCHNEIDER (201)-263-396  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

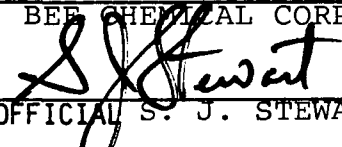
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

BEE CHEMICAL COMPANY, a subsidiary of  
MORTON THIOKOL, INC., named in the  
Administrative Order and Consent as  
COMPANY BEE CHEMICAL CORPORATION,

BY:

  
NAME OF OFFICIAL S. J. STEWART

Vice President

TITLE

September 18, 1985

DATE

Daniel Boone, Jr. (312) 807-2432  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

2019

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

BENJAMIN MOORE & CO.

COMPANY

*John E. Lynch*  
NAME OF OFFICIAL

Vice President - Operations

TITLE

September 19, 1985

DATE

201-573-9600 Karl J. Rohrbacher, Esq.

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 23 1985

**CONSENT**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Ber-Mar, Inc..

COMPANY

NAME OF OFFICIAL

Vice President

TITLE

September 19, 1985

DATE

718/643-1770 Robert Gold  
212/757-5050 Ira Rose

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Borden, Inc.

COMPANY

Hx

A.S. D'Amato

President, Borden Chemical Division  
TITLE

September 20, 1985

DATE

Harvey A. Rosenzweig

(614) 225-4473

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Bowen Engineering, Inc.  
(formerly Stork Bowen Engineering Inc.)

COMPANY

Richard D. Potts

NAME OF OFFICIAL -- Richard D. Potts

Controller

TITLE

September 20, 1985

DATE

201-725-3232 Herbert J. Gannon

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her. ~~copy~~

Robert M. Canfield  
RESPONDENT (Please type name)

Name of Official

9/20/85  
DATE

**Title**

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

CUSTOM CHEMICALS CO.  
RESPONDENT (Please type name)

ELMWOOD PARK, NJ 07407

Robert C. Viller  
Name of Official

Sept 20 1985  
DATE

PRESIDENT  
Title

**CONSENT**

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions: ✓

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Dated: September 19, 1985

On behalf of CECOS International, Inc.,  
formerly known as Newco Chemical Waste  
Systems, Inc., and Browning-Ferris  
Industries of Elizabeth, N.J., Inc.

By: CECOS INTERNATIONAL, INC.

By: 

Ramsey G. DiLibero, President

Mailing Address:

2321 Kenmore Avenue  
Buffalo, NY 14207

Telephone Number and Name of  
Company Contact Person:

J. Stephen Buchanan  
Corporate Counsel  
CECOS International, Inc.  
(716) 873-4200

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CELLU-CRAFT INC.  
COMPANY

Kenneth David Burrows  
NAME OF OFFICIAL

General Counsel and Secretary  
TITLE

September 23, 1985  
DATE

(516) 775-8000  
John Ayers  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Chemcoat  
COMPANY  
James M. O'Brien  
NAME OF OFFICIAL James M. O'Brien  
President  
TITLE  
9/19/85  
DATE  
717-368-8631  
Nadine P. Pelleschi  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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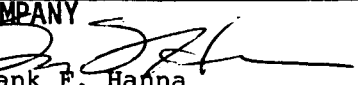
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

CHEMICAL DYNAMICS CORPORATION  
COMPANY

  
Frank F. Hanna

NAME OF OFFICIAL

Vice President  
TITLE

September 18, 1985  
DATE

E.O. Lundell, (201) 753-5000  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

SEP 19 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

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CHEMICAL DYNAMICS CORPORATION

COMPANY

  
Frank F. Hanna

NAME OF OFFICIAL

Vice President

TITLE

September 18, 1985

DATE

E.O. Lundell, (201) 753-5000

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

CONVERTERS INK COMPANY  
RESPONDENT (Please type name)

*Philip R. Pierro*

Philip R. Pierro  
Name of Official

September 19, 1985  
DATE

Director of Manufacturing  
Title

SCP-Carlstadt Site  
Index No. II CERCLA-50114

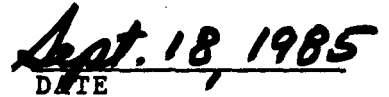
CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Dart & Kraft, Inc.

RESPONDENT (Please type name)

  
Name of Official

  
DATE

Director, Regulatory Affairs

Title

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

DECORATIVE INDUSTRIES INC  
COMPANY

Carrie M. Ferraro  
NAME OF OFFICIAL

D.P.  
TITLE

9-19-85  
DATE

914-753-2746  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Dri-Print Foils Inc.

329 New Brunswick Avenue  
Rahway, New Jersey 07065

RESPONDENT (Please type name)

  
Name of Official

9/19/85  
DATE

Vice President & General Manager

Title

T. M. ARMSTRONG ✓

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

DURALAC INC. (formerly DURALAC CHEMICAL  
COMPANY CORP.)

*Thomas M. Armstrong*  
NAME OF OFFICIAL

President  
TITLE

September 19, 1985  
DATE

(201) 589-2946 - E. S. Leister or  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON  
(201) 622-7675 - R. S. Solomon, Esq.

✓  
T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order\* and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

\*Administrative Order  
on Consent,  
Index No. II CERCLA-50114  
Forwarded with EPA Letter,  
dated September 13, 1985,  
signed by Walter E. Mugdan

E. R. Squibb & Sons, Inc.

COMPANY

Howard R. Harrison

NAME OF OFFICIAL Howard R. Harrison

Vice President, Regulatory Counsel and  
TITLE Quality Assurance

September 20, 1985

DATE

Richard Rosfjord

201-545-1300

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

ELL-BEE CHEMICAL COMPANY, INC.

COMPANY

  
Robert P. Scanga

NAME OF OFFICIAL

President

TITLE

September 23, 1985

DATE

Joseph J. Maraziti, Jr.

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

Maraziti, Falcon and Gregory  
65 Madison Avenue - Morristown, N.J. 07960  
(201) 538-1221

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

ENVIRONMENTAL WASTE REMOVAL, INC.

COMPANY

*Mary Anne Taufen*  
MARY ANNE TAUFEN  
NAME OF OFFICIAL

ATTORNEY FOR EWR, INC.

TITLE

September 23, 1985

DATE

(203) 878-8515 (same as above)  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

ESSELTE PEWDAFLEX CORP.  
(formerly  
Oxford PendaFlex Corp.  
COMPANY

Robert R. Black  
NAME OF OFFICIAL

Vice President  
TITLE

September 25, 1985  
DATE

\_\_\_\_\_  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985 ✓

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

EXXON COMPANY, USA

By: J. C. Hook

COMPANY

J. C. Hook

NAME OF OFFICIAL

Bayway Refinery Manager

TITLE

9/20/85

DATE

Paula T. Dow, Esq. (201) 474-3302

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

De P. 0176

-20-

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

BJR R. T. Murrill  
RESPONDENT (Please type name)

9-24-85

R. T. Murrill  
Name of Official

DATE

PRODUCTION MANAGER F&FP  
Title



E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED  
WILMINGTON, DELAWARE 19898

30 SEP 1985  
Mugden  
CERCLA

LEGAL DEPARTMENT

September 25, 1985

AIRBORNE

Waste and Toxic Substances Branch  
Office of Regional Counsel (Room 437)  
U.S. E.P.A. - Region II  
26 Federal Plaza  
New York, NY 10278

Dear Sirs:

In reply to your letter of September 13, 1985 to the Du Pont Company, Re: Scientific Chemical Processing, Inc., 216 Paterson Plank Road, New Jersey - Administrative Order Pursuant to Section 106 of CERCLA, I attach a copy of the Administrative Order on Consent, Index No. II CERCLA-50114, signed by an authorized person of the Du Pont Company.

Sincerely,

Bernard J. Reilly

BJR:jad  
Attachment

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

FABERGE INCORPORATED  
COMPANY

*Manella*  
NAME OF OFFICIAL

CHAIRMAN/PRES  
TITLE

9/20/85  
DATE

JACOB HOLLANDER ESC  
212 307 8130

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

FAIRCHILD CAMERA AND  
INSTRUMENT CORPORATION

COMPANY

NAME OF OFFICIAL

Donald W. Brooks  
President

TITLE

September 19, 1985

DATE

Deborah J. Schmall  
(415) 788-5000

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 19 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

GAF CORPORATION

COMPANY

Edward E. Shea

NAME OF OFFICIAL

SENIOR VICE PRESIDENT

TITLE

9/17/85

DATE

SAME 201-628-3990

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

I. M. ARMSTRONG

SEP 23 1985 ✓

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

GANES CHEMICALS, INC.

COMPANY

  
EMIL GUNTARDT

NAME OF OFFICIAL

PRESIDENT

TITLE

9/19/85

DATE

(212) 391-2580 Juel West

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 18 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

General Electric Company  
COMPANY

Thomas M. Armstrong  
NAME OF OFFICIAL

Counsel - Environmental Issues  
TITLE

9-16-85  
DATE

203-373-2282 (above name)  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

L. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

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- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

GENERAL MOTORS CORPORATION

COMPANY

LEONARD F. CHARLA

NAME OF OFFICIAL

SENIOR COUNSEL

TITLE

9/24/85

DATE

201 622 7711 LOU DE STEFANO

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

OCT 31 1985  
Chojnowski  
SCP- Carlstadt

CARPENTER, BENNETT & MORRISSEY

JAMES D. CARPENTER (1909-1972)

THOMAS L. MORRISSEY  
ARTHUR M. LIZZA  
WARREN LLOYD LEWIS  
LAURENCE REICH  
STANLEY WEISS  
JOHN C. HEAVEY  
JOHN E. KEALE  
EDWARD F. RYAN  
JAMES J. CROWLEY, JR.  
JOHN P. DWYER  
DAVID M. McCANN  
MICHAEL S. WATERS  
ANTHONY C. FAMULARI  
JAMES G. GARDNER  
JOHN F. LYNCH, JR.  
FRANCIS X. O'BRIEN

DONALD A. ROMANO  
ROBERT E. TURTZ  
FRANCIS X. DEE  
RUDY B. COLEMAN  
EDWARD F. DAY, JR.  
DEAN R. MAY  
JEROME E. SHARFMAN  
IRVING L. HURWITZ  
ROSEMARY ALITO  
EDWIN R. ALLEY  
ROSEMARY J. BRUNO  
WILLIAM A. CARPENTER, JR.  
JOHN J. PEIRANO  
LINDA B. CELAURO  
JOHN D. GOLDSMITH  
THOMAS J. LENNON

LAW OFFICES  
GATEWAY THREE  
100 MULBERRY STREET  
NEWARK, N.J. 07102

TELEPHONES  
NEW JERSEY 622-7711  
(AREA CODE 201)  
NEW YORK 943-6530  
(AREA CODE 212)

TELECOPIER  
(201) 622-5314

ELMER J. BENNETT, OF COUNSEL  
ALEXANDER COHEN, SPECIAL COUNSEL  
MEMBER OF N.Y. AND PA. BARS ONLY

October 29, 1985

Ms. Kathleen J. Chojnowski  
Assistant Regional Counsel  
Waste & Toxic Substances Branch  
Office of Regional Counsel  
U.S. EPA  
26 Federal Plaza  
New York, New York 10278

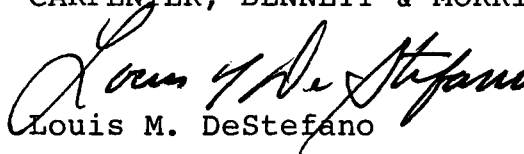
Re: SCP Carlstadt

Dear Kathy:

Please substitute the enclosed executed Consent form  
for the one previously submitted by General Motors Corporation.

Very truly yours,

CARPENTER, BENNETT & MORRISSEY

  
Louis M. DeStefano

LMDeS:las  
Enclosure

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

DAVID D. CAMPBELL

RESPONDENT (Please type name)

David D. Campbell  
Name of Official

Oct 15, 1985  
DATE

VICE PRESIDENT & GROUP DIRECTOR-OPERATIONS  
CHEVROLET, PONTIAC, CANADA GROUP  
Title

✓  
T. M. ARMSTRONG

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
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  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Georgia-Pacific Corporation for  
Xcel Corporation

COMPANY

*Douglas P. Roberto*

Douglas P. Roberto

NAME OF OFFICIAL

Attorney

TITLE

September 19, 1985

DATE

(404) 521-4824

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

Gilbert Spruance

-20-

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Robert M. Cox, Jr.

RESPONDENT (Please type name)

Robert M. Cox, Jr.

Name of Official

9/19/85

DATE

President

Title

**T. M. ARMSTRONG**

**SEP 23 1985**

**CONSENT**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

GRUMMAN AEROSPACE CORPORATION  
**COMPANY**

  
**NAME OF OFFICIAL**

R. J. Myers  
Senior Vice President

**TITLE**

GRUMMAN CORPORATION  
September 20, 1985

**DATE**

516 - 575-3342

**TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON**

John B. Ball  
Assistant General Council

CONSENT

SEP 23 1985 ✓

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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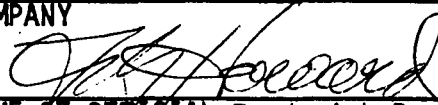
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

GTE Products Corporation

COMPANY

  
NAME OF OFFICIAL Frederick B. Howard

Vice President and General Manager  
TITLE

September 20, 1985  
DATE

Vincent Gallogly  
(203) 775-0111

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

J. M. ARMSTRONG ✓

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Inland Steel Container Corp.

COMPANY

Dean A. Calland  
NAME OF OFFICIAL

Attorney for Inland Steel Container  
TITLE

September 20, 1985

DATE

Dean A. Calland, Esq. (412) 394-2436  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

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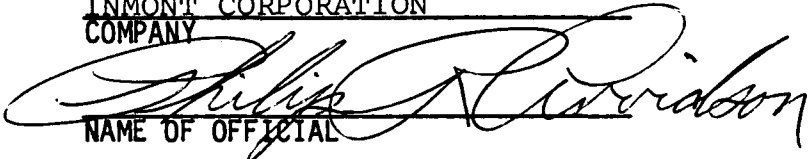
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

INMONT CORPORATION  
COMPANY

  
NAME OF OFFICIAL

Vice President-Environmental Affairs  
TITLE

September 20, 1985  
DATE

Robert M. Blanchfield, 201-365-3537  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

L. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

J. Josephson, Inc.  
COMPANY

  
NAME OF OFFICIAL R. Parrish

Treasurer  
TITLE

September 20, 1985  
DATE

(201) 440-7000  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

**T. M. ARMSTRONG**  
**T. M. ARMSTRONG**  
**SEP 23 1985**  
**SEP 2**

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

J. Landau & Co., Inc.

COMPANY

*Walter J. Landau*

NAME OF OFFICIAL

Walter J. Landau

Pres.

TITLE

9/23/85

DATE

201-939-7419 W.J. Landau

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

J. M. Huber Corporation  
RESPONDENT (Please type name)

  
Name of Official - W. J. Ryan

September 19, 1985  
DATE

Vice President - Finance & Controller  
Title

T. M. ARMSTRONG

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

J. T. BAKER CHEMICAL COMPANY  
COMPANY

EDWIN F. WHITING  
NAME OF OFFICIAL

VICE PRESIDENT - OPERATIONS  
TITLE

SEPTEMBER 18, 1985  
DATE

(201) 859-2151, Ext. 665  
MARCY M. MATLOSZ, DIRECTOR ENVIRONMENTAL  
TELEPHONE NUMBER AND NAME OF AFFAIRS  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

John L. Armitage & Co  
RESPONDENT (Please type name)

Philip S. Banashek  
Philip S. BANASHEK  
Name of Official

9/19/85  
DATE

CONTROLLER  
Title

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Johnson & Johnson

COMPANY

*Charles A. Harris*  
Charles A. Harris

NAME OF OFFICIAL

Attorney

TITLE

September 23, 1985

DATE

(201) 524-5766 (same as above)

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

**I. M. ARMSTRONG**

**SEP 23 1985**

**CONSENT**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

**For Kewanee Industries, Inc.  
(Harshaw Chemical Company)**  
COMPANY

**James N. Stambolis**  
NAME OF OFFICIAL  
**Supervisor Facilities Planning  
Environment & Health Protection**  
TITLE

**September 20, 1985**  
DATE

**415/894-2996 (Same as signee)**  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

✓  
**T. M. ARMSTRONG**

**CONSENT**

**SEP 23 1985**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

L.E. CARPENTER  
COMPANY

James B. Ashby / 5102  
NAME OF OFFICIAL

VICE PRESIDENT, GENERAL COUNSEL & SECRETARY  
TITLE

9-20-85  
DATE

Timothy D. Hoffman (513) 226-5125  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Langer Transport Company  
COMPANY

  
NAME OF OFFICIAL

TITLE

SEP 23 1985

DATE

Marc J. Keane, Keane, Brady and Hanlon  
40 Journal Square, Jersey City, New Jersey  
TELEPHONE NUMBER AND NAME OF (201) 656-8200  
COMPANY CONTACT PERSON

J  
T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

By MET Chemicals Inc.  
COMPANY William H. Brewster  
William H. Brewster  
NAME OF OFFICIAL  
Vice President  
TITLE  
9/20/85  
DATE  
WILLIAM ASKINS  
201-499-2409  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Maas + Waldstein Co.  
COMPANY

Melvin S. Kaye  
NAME OF OFFICIAL

President  
TITLE

9/17/85  
DATE

(201) 484-1600 - Melvin S. Kaye  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Mack Trucks, Inc.

COMPANY

W. J. Kerber

NAME OF OFFICIAL

Executive Vice President - Manufacturing

TITLE

September 20, 1985

DATE

Kenneth A. Blythe, Senior Staff Attorney

TELEPHONE NUMBER AND NAME OF (215) 439-3116  
COMPANY CONTACT PERSON

I. M. ARMSTRONG

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Magid Corporation  
COMPANY

[Signature]  
NAME OF OFFICIAL

Executive Vice President  
TITLE

September 19, 1985  
DATE

516-234-1660  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

MERCK & CO., Inc.

COMPANY

NAME OF OFFICIAL

David A. Conklin

TITLE

Vice President & General Manager, MCMD

September 23, 1985

DATE

Christine M. Stuehrk, Esq. (201)574-7346

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

MOBAY CHEMICAL CORPORATION  
(HARMON COLORS CORPORATION)

COMPANY

Robert Wackerlin  
NAME OF OFFICIAL

Vice President, Gen. Manager  
TITLE

September 20, 1985  
DATE


(412-) 777-3480  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

MOBIL CHEMICAL COMPANY  
\_\_\_\_\_  
RESPONDENT (Please type name)

  
\_\_\_\_\_  
Name of Official T. G. SIMONS

VICE PRESIDENT, PLANNING AND  
ENVIRONMENTAL AFFAIRS

\_\_\_\_\_  
Title

\_\_\_\_\_  
SEPTEMBER 23, 1985

\_\_\_\_\_  
DATE

L. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Monsanto Company  
COMPANY

Francis E. Kearney  
NAME OF OFFICIAL

Dir. Environ. Opns - MBB  
TITLE

Sept. 20, 1985  
DATE

A. W. Thompson 314/694-5449  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).


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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

NEPERA, INC.  
COMPANY

  
NAME OF OFFICIAL ROBERT H. KUNDIN  
CORPORATE SECRETARY AND  
DIRECTOR OF LEGAL AFFAIRS  
TITLE

SEPTEMBER 17, 1985  
DATE

ROBERT H. KUNDIN  
(914) 782-8171, ext. 225  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

J. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

New England Formulates Co., Inc.  
COMPANY

Harry L. Linzer  
NAME OF OFFICIAL

Secy  
TITLE

9-10-85  
DATE

212-704-6315 PATRICIA L. TRUSCELLI  
516-354-4100 HARRY LINZER  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

NEW PENN MOTOR EXPRESS, INC.  
COMPANY

Heath L. Allen  
NAME OF OFFICIAL  
Heath L. Allen  
Secretary  
TITLE

Sept 24, 1985  
DATE

Heath L. Allen 717-255-8011  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

R. Jeffrey Byler  
COMPANY

OWENS-ILLINOIS, INC  
NAME OF OFFICIAL

SENIOR ATTORNEY  
TITLE

9/19/85  
DATE

(419) 247-1142  
Joyce Ann Edgcombe  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

PACKAGING SYSTEMS CORPORATION  
COMPANY

  
NAME OF OFFICIAL Alan F. Burnham

Director of Operations  
TITLE

September 19, 1985  
DATE

(914) 359-4100, Extention 230 (Bob Naujelis)  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

PAN CHEMICAL CORPORATION

COMPANY

*Michael A. Spero*  
MICHAEL A. SPERO

NAME OF OFFICIAL

SECRETARY-TREASURER

TITLE

SEPTEMBER 23, 1985

DATE

201-427-4300 ANNE R. KENNEDY  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

**T. M. ARMSTRONG**

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Pacquet Oneida, Inc., successor to  
Oneida Packaging Products

COMPANY

  
Helmut M. Kern

NAME OF OFFICIAL

Vice President

TITLE

September 19, 1985

DATE

John Duggan  
201-777-5600


TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

SEP 25 1985

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

PERK CHEMICAL CO., INC  
RESPONDENT (Please type name)

  
Name of Official

9/23/85  
DATE

President  
Title

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Permacel

COMPANY

Charles A. Harris

NAME OF OFFICIAL

Attorney

TITLE

September 23, 1985

DATE

(201) 524-5766 (same as above)  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

J. M. ARMSTRONG ✓

CONSENT

SEP 20 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

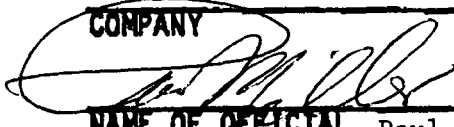
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Pfizer Inc.

COMPANY

  
NAME OF OFFICIAL Paul S. Miller  
Assoc. General Counsel/  
Assist. Secretary

TITLE

September 19, 1985

DATE

William D. Huhn  
(203) 441-4915TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Amiel Hunt

September 25, 1985  
**DATE**

Title

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Pyrolac Corporation  
\_\_\_\_\_  
COMPANY

Stephen Dulberg  
\_\_\_\_\_  
NAME OF OFFICIAL

President  
\_\_\_\_\_  
TITLE

September 20, 1985  
\_\_\_\_\_  
DATE

201-427-1400 Stephen Dulberg  
\_\_\_\_\_  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

✓  
T. M. ARMSTRONG

SEP 18 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

QUALITY CHEMICALS, INC.

COMPANY

  
NAME OF OFFICIAL

MELVIN MILLER

VICE-PRESIDENT

TITLE

SEPTEMBER 17, 1985

DATE

(814)684-4310 MELVIN MILLER

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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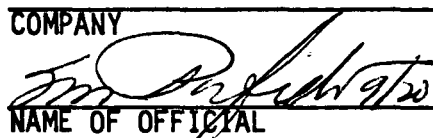
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

RCA Corporation

COMPANY

  
NAME OF OFFICIAL

Staff Vice President

Environmental and Facilities Services

TITLE

September 20, 1985

DATE

Donald B. Bauer, Senior Counsel

Facilities and Materials, 609-734-9895

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Recycling Industries, Inc.

COMPANY

Joan G. Bernstein

NAME OF OFFICIAL

Vice President and General Counsel,  
Chemical Waste Management, Inc. INTER  
ALIA Former Owner of Respondent - RII

TITLE

September 23, 1985

DATE

Dorothy J. Howell  
312/654-8800 Ext. 641

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

J. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

RELIANCE UNIVERSAL INC.

COMPANY

NAME OF OFFICIAL PAUL E. BROOKS, JR.

CORPORATE MANAGER - ENVIRONMENTAL,  
OCCUPATIONAL HEALTH AND PRODUCT

TITLE SAFETY AFFAIRS

September 18, 1985

DATE

(502) 459-9110

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

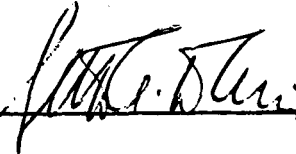
CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

Revlon, Inc.

RESPONDENT (Please type name)

Seth A. Davis  
Name of Official



September 11, 1985  
DATE

Senior Regulatory Counsel  
Title

1. This consent shall be effective and binding upon the above signed Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Reynolds Metals Company

COMPANY

R D O'Donnell

NAME OF OFFICIAL

R. D. O'Donnell

Vice President and General Manager

TITLE

September 19, 1985

DATE

C. R. Tompkins (804) 743-5284

Manager of Environmental Control

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

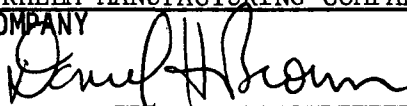
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

RHEEM MANUFACTURING COMPANY  
COMPANY

  
NAME OF OFFICIAL

Vice President-General Counsel  
TITLE

September 19, 1985  
DATE

Burton L. Levine 212/530-6685  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG ✓

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Ridge Printing Co Inc  
COMPANY

Peter Cohaw - Peter Cohaw  
NAME OF OFFICIAL

V. P.  
TITLE

Sept 19, 1985  
DATE

201 943 8267  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

ROHM AND HAAS COMPANY

COMPANY

Ellen S. Friedell

ELLEN S. FRIEDEL, ESQUIRE

NAME OF OFFICIAL

SENIOR COUNSEL

TITLE

SEPTEMBER 19, 1985

DATE

215-592-2582 ELLEN S. FRIEDEL

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Schenectady Chemicals, Inc.  
COMPANY

Robert P. Yumick  
NAME OF OFFICIAL

Vice President - Corporate Technology  
TITLE

September 20, 1985  
DATE

(518) 370-4200 - Robert P. Yumick  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

SCIENTIFIC CHEMICAL PROCESSING CO., INC.  
RESPONDENT (Please type name)

*Dominick Presto*

DOMINICK PRESTO  
Name of Official

September 25, 1985  
DATE

REGISTERED AGENT  
Title

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

James J. Lenzotti

9/19/85

RESPONDENT (Please type name)

For The Sherwin-Williams Co.

James J. Lenzotti  
Name of Official

9/19/85  
DATE

Director, Environmental, Health and  
Title Regulatory Services

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

9/18/85-

9/18/85

DATE

Please see attached letter as to my financial situation.

Rfr Leonard

P. O. Box 1000

DORM 5

MONTGOMERY, PA 17752

T. M. ARMSTRONG

CONSENT

SEP 23 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

COMPANY

NAME OF OFFICIAL

TITLE

DATE

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

*Samuel Shuman & Co. Inc.*

*Samuel Shuman*

*Pres*

*9/20/85*

*717-326-9041*

I. M. ARMSTRONG

SEP 19 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

STAR EXPANSION COMPANY  
COMPANY

NAME OF OFFICIAL Roland G. Nasser

PRESIDENT  
TITLE

SEPTEMBER 17, 1985  
DATE

(914) 534-2511  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Swope Oil & Chem Co  
COMPANY

Albert W. Spitz  
NAME OF OFFICIAL

Pres.  
TITLE

9-24-85  
DATE

Albert W. Spitz 215-884-7182  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).


3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

TECHNICAL COATINGS CO.

COMPANY

  
NAME OF OFFICIAL

PRESIDENT

TITLE

September 19, 1985

DATE

201-573-9600 Karl J. Rohrbacher, Esq.

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

TEVAX FINISHING Products Co.  
COMPANY

JOHN H. KLOCK  
NAME OF OFFICIAL

ATTORNEY AT LAW  
TITLE

September 20, 1985  
DATE

201-622-2235 - JOHN Klock  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Tenneco Resins, Inc.

COMPANY



NAME OF OFFICIAL H. R. Bowers

President

TITLE

September 24, 1985

DATE

Harold F. Hees, (713) 757-2607

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

TRANSCO PRODUCTS CORP.  
COMPANY

Frederick L. Buckler  
NAME OF OFFICIAL

Chairman  
TITLE

September 20, 1985  
DATE

201-862-0030

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

Fred Buckler or Bob Cosulich

T. M. ARMSTRONG

SEP 23 1985 ✓

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

TROY CHEMICAL CORPORATION  
COMPANY

Jane Yuster  
NAME OF OFFICIAL

DIRECTOR, ENVIRONMENTAL AND REGULATORY AFFAIRS  
TITLE

9/18/85  
DATE

(201) 589-2500 Jane Yuster  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

TUNGSTEN PRODUCTS CORP.

COMPANY

NAME OF OFFICIAL

William M. Ramaccia

President

TITLE

September 20, 1985

DATE

c/o (201) 447-1850, Robert L. Garibaldi, Jr., Esq  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SCP-Carlstadt Site  
Index No. II CERCLA-50114

CONSENT

The Respondent identified below has had an opportunity to confer with EPA about this matter. Said Respondent hereby consents to the issuance of this Order and to its terms. Furthermore, each of the signatories to this Order certifies that he or she is fully authorized to enter into the terms and conditions of this Order and to legally bind the Respondent to the Order so represented by him or her.

U. S. Pipe and Foundry Company  
RESPONDENT (Please type name)

William E. Fleck  
Name of Official

9-20-85  
DATE

Vice President-Manufacturing  
Title

J. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

U.S. Polymeric  
A Division of HITCO

COMPANY

  
NAME OF OFFICIAL R. Barry Wrenn

Secretary  
TITLE

September 20, 1985  
DATE

(714) 720-9350 R. Barry Wrenn  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

L. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

UNION CARBIDE CORPORATION  
COMPANY  
[Signature]  
NAME OF OFFICIAL  
CORPORATE VICE PRESIDENT  
HEALTH, SAFETY AND ENVIRONMENTAL AFFAIRS  
TITLE  
9/20/85  
DATE  
RICHARD G. TUSCH (203) 794 6584  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

### CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

The Vorac Company  
COMPANY

Nat Golden  
NAME OF OFFICIAL

Nat Golden, President  
TITLE

September 24, 1985

DATE M. Kirshen  
201-933-1000

TELEPHONE NUMBER AND NAME OF

T. M. ARMSTRONG

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Wesley Hoaguer Co Inc.  
COMPANY

MARTIN STONE  
NAME OF OFFICIAL

TREA.  
TITLE

Sept 19, 1985  
DATE

718 855 7676 MARTY STONE  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
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5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

WESTINGHOUSE ELECTRIC CORPORATION  
COMPANY

Frank S. Beal  
FRANK S. BEAL  
NAME OF OFFICIAL

DIRECTOR - ENVIRONMENTAL AFFAIRS  
TITLE

SEPTEMBER 20, 1985  
DATE

412-642-3891 FRANK S. BEAL  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

✓  
J. M. ARMSTRONG

SEP <sup>19</sup>~~20~~ 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).


2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

WHITTAKER CORPORATION  
COMPANY

  
NAME OF OFFICIAL

MANAGER, CAPITAL ASSETS  
TITLE

9/18/85  
DATE

(213) 475-9411 (Sol Spiller)  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

20 19

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

BENJAMIN MOORE & CO.

COMPANY

*John E. Lynch*  
NAME OF OFFICIAL

Vice President - Operations.

TITLE

September 19, 1985

DATE

201-573-9600 Karl J. Rohrbacher, Esq.  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

-----X  
IN THE MATTER OF

AIR PRODUCTS & CHEMICALS, INC.  
ALLIED CORPORATION  
AMERICAN CAN CO.  
AMERICAN CYANAMID(including LEDERLE  
LABORATORIES AND SHULTON, INC.)  
AMERICAN FLANGE & MANUFACTURING  
COMPANY, INC.  
AMERICAN HOECHST CORPORATION  
AMERICAN INKS & COATINGS CORP.  
AMERICAN STANDARD INC.  
ARMSTRONG WORLD INDUSTRIES, INC.  
ASHLAND CHEMICAL CO. (DIVISION OF  
ASHLAND OIL, INC.)  
AT&T TECHNOLOGIES, INC.  
BASF WYANDOTTE CORPORATION  
BEE CHEMICAL CORPORATION  
BENJAMIN MOORE & CO.  
BER-MAR, INC.  
BORDEN, INC.  
BOWEN ENGINEERING, INC.  
HERBERT G. CASE, JR.  
CECOS INTERNATIONAL, INC.(for CECOS  
INTERNATIONAL, INC., BROWNING  
FERRIS INDUSTRIES, INC. and NEWCO:  
CHEMICAL WASTE SYSTEMS, INC.)  
CELLU-CRAFT, INC.  
CHEMCOAT, INC.  
CHEMICAL DYNAMICS CORPORATION  
CHEMRAY COATINGS CORP.  
CIBA-GEIGY CORPORATION  
CITIES SERVICE OIL AND GAS CORP.  
CONTINENTAL TECHNICAL FINISHES CORP.  
CONVERTERS INK CO.  
CUSTOM CHEMICALS CO., INC.  
DART & KRAFT, INC.  
DECORATIVE INDUSTRIES, INC.  
DRI-PRINT FOILS, INC.  
DURALAC, INC.  
E.I. DUPONT DE NEMOURS & CO.  
E.R. SQUIBB & SONS, INC.  
ELL-BEE CHEMICAL COMPANY, INC.  
ENVIRONMENTAL WASTE REMOVAL, INC.  
ESSELTE PENDAFLEX CORP.  
EXXON COMPANY, U.S.A.  
FABERGE, INC.  
FAIRCHILD CAMERA AND INSTRUMENT  
CORP.

ADMINISTRATIVE ORDER  
ON CONSENT

Index No. II CERCLA-50114

GAF CORPORATION	:
GANES CHEMICALS, INC.	:
GENERAL ELECTRIC COMPANY	:
GENERAL MOTORS CORPORATION	:
GEORGIA-PACIFIC CORP(for XCEL CORP.):	:
GILBERT SPRUANCE COMPANY	:
GRUMMAN AEROSPACE CORPORATION	:
GTE PRODUCTS CORP.	:
INLAND STEEL CONTAINER CORP.	:
INMONT CORPORATION	:
J. JOSEPHSON, INC.	:
J. LANDAU & CO., INC.	:
J.M. HUBER CORPORATION	:
J.T. BAKER CHEMICAL CO.	:
JOHN L. ARMITAGE & CO.	:
JOHNSON & JOHNSON	:
KEWANEE INDUSTRIES, INC.	:
L.E. CARPENTER & CO.	:
LANGER TRANSPORT CO.	:
M & T CHEMICALS, INC.	:
MAAS & WALDSTEIN CO.	:
MACK TRUCKS, INC.	:
MAGID CORPORATION	:
MERCK & CO., INC.	:
MOBAY CHEMICAL CORPORATION	:
MOBIL CHEMICAL CO.	:
MONSANTO CO.	:
NEPERA, INC.	:
NEW ENGLAND LAMINATES CO., INC.	:
NEW PENN MOTOR EXPRESS, INC.	:
OWENS-ILLINOIS, INC.	:
PACKAGING SYSTEMS CORPORATION	:
PAN CHEMICAL CORPORATION	:
PACQUET ONEIDA, INC.	:
PERK CHEMICAL CO., INC.	:
PERMACEL	:
PFIZER INC.	:
DOMINICK PRESTO	:
PYROLAC CORPORATION	:
QUALITY CHEMICALS, INC.	:
RCA CORPORATION	:
RECYCLING INDUSTRIES, INC.	:
RELIANCE UNIVERSAL, INC.	:
REVLON, INC.	:
REYNOLDS METALS COMPANY	:
RHEEM MANUFACTURING CO.	:
RIDGE PRINTING CO., INC.	:
ROHM & HAAS COMPANY	:
SCHENECTADY CHEMICALS, INC.	:
SCIENTIFIC CHEMICAL PROCESSING, INC.:	:
SHERWIN-WILLIAMS CO.	:
LEIF R. SIGMOND	:
SIMON WRECKING CO., INC.	:
STAR EXPANSION COMPANY	:

SWOPE OIL & CHEMICAL CO.	:
TECHNICAL COATINGS CO.	:
TENAX FINISHING PRODUCTS CO.	:
TENNECO RESINS, INC.	:
TRANSCO PRODUCTS CORP.	:
TROY CHEMICAL CORP.	:
TUNGSTEN PRODUCTS CORP.	:
U.S. PIPE & FOUNDRY CO.	:
U.S. POLYMERIC (A DIVISION OF HITCO):	:
UNION CARBIDE CORP.	:
VORAC COMPANY	:
WESLEY LACQUER CO., INC.	:
WESTINGHOUSE ELECTRIC CORP.	:
WHITTAKER CORPORATION	:

Respondents.:

Proceeding Under Section 106(a)	:
of the Comprehensive Environ-	:
mental Response, Compensation	:
and Liability Act, 42 U.S.C.	:
\$9606(a)	:
-----x	:

#### JURISDICTION

The following Administrative Order on Consent ("Order") is entered into with the above-captioned Respondents pursuant to the authority vested in the President of the United States by §106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606(a), which authority was delegated to the Administrator of the United States Environmental Protection Agency (EPA) by Executive Order 12316, 46 Fed. Reg. 42237 (August 20, 1981) and duly redelegated to the Regional Administrator, EPA Region II on March 17, 1983. Pursuant to that authority, EPA hereby makes the following Findings and Determination and issues the following Order on Consent. Pursuant to Section 106(a) of CERCLA, the State of New Jersey Department of Environmental Protection (NJDEP) has been notified of this Order.

#### DEFINITIONS

1. As used in this Order, unless otherwise clearly required by context, the following terms shall have the following meanings:

A. Respondents shall include all individuals, companies, partnerships, or other business entities listed in the caption of this Order.

B. Generator Respondents shall include all Respondents with the exception of Leif R. Sigmond, Dominick Presto, Herbert Case, Mack Barnes, Scientific Chemical Processing, Inc., Inmar Associates, and Transporter Respondents.

C. Transporter Respondents shall include any Respondents who accepted hazardous substances for transport by air, rail, highway, water, etc. to the facility.

D. Owner/Operator Respondents shall include Inmar Associates, Leif R. Sigmond, Dominick Presto, Herbert Case, Mack Barnes, and Scientific Chemical Processing, Inc.

E. Facility shall mean real property located at 216 Paterson Plank Road, Carlstadt, New Jersey and occupying Block 124, Lots 1 through 5 on the tax map of Bergen County, Township of Carlstadt.

F. CERCLA shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §9601 et seq., P.L. 96-510.

G. Hazardous Substance shall mean any substance that falls within the definition of "Hazardous Substance" as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

H. Designated Coordinator shall mean the person designated by Respondents which person shall be charged with the duty of, at all times, being knowledgeable about and overseeing the progress of all work performed pursuant to this Order.

I. National Contingency Plan (NCP) shall mean the National Oil and Hazardous Substances Contingency Plan promulgated by EPA pursuant to §105 of CERCLA, 42 U.S.C. §9605, and codified at 40 CFR Part 300, and all amendments or modifications thereto.

J. Remedial Action shall have the meaning set forth in the portion of the NCP found at 40 CFR §300.6.

#### STATEMENT OF PURPOSE

2. EPA and the consenting parties, acting in good faith to resolve certain problems arising out of this matter, to further the public interest, to avoid prolonged and complicated litigation between the parties, and to undertake a remedial investigation and feasibility study to determine the extent to which hazardous substances are present at the site, and to develop remedial alternatives, without trial or adjudication of any issues of fact or law and without admission by the consenting parties to liability for any purpose, enter into this Consent Order.

EPA FINDINGS OF FACT

3. Each Respondent is a person, as defined in §101(21) of CERCLA, 42 U.S.C. §9601(21), and a responsible party under Section 107(a) of CERCLA, 42 U.S.C. §9607(a). It is EPA's position that each Respondent is jointly and severally responsible, with each and every other Respondent, for carrying out the provisions of this Order.

4. The hazardous substances referred to in this Order shall mean any substances meeting the definition of "Hazardous Substance" as defined in §101(14) of CERCLA, 42 U.S.C. §9601(14).

5. Inmar Associates, Inc. is a corporation organized under the laws of the State of New Jersey and doing business in the State of New Jersey, which owns a parcel of property in Carlstadt, Bergen County, New Jersey. The property is bordered on the north by Peach Island Creek, a surface water of the United States, on the south by Paterson Plank Road, on the west by Gotham Parkway, and on the east by Carolina Trucking Company ("the Inmar Property"). The property consists of Block 124, Lots 1 through 5, Township of Carlstadt (See Figure 1, attached).

6. During the period commencing in or about 1970 and continuing until in or about 1980, the Inmar property was leased by Scientific Chemical Processing, Inc. (a corporation organized under the laws of the State of New Jersey), which operated on the property a waste collection, transportation, treatment and disposal service. The property leased by Inmar Associates, Inc. to Scientific Chemical Processing, Inc. constitutes a "Facility," as that term is defined in §101(9) of CERCLA, 42 U.S.C. §9601(9). The property shall hereinafter be referred to as "the site" or "the facility."

7. During the period of its operation, Scientific Chemical Processing, Inc. accepted, transported, transferred, stored, reprocessed, reclaimed, treated, blended, and disposed of certain materials which contained hazardous substances.

8. The Owner/Operator Respondents to this Order owned the facility and/or operated businesses at the facility which engaged in the transfer, storage, reprocessing, reclamation, reuse, blending, treatment, and/or the disposal of hazardous substances.

9. The Generator Respondents to this Order made arrangements with transporters and/or Scientific Chemical Processing, Inc. for the transport, storage, treatment or disposal of hazardous substances, which include certain substances chemically identical to or similar to those released and/or in danger of being released from the facility to the environment.

10. The Transporter Respondents to this Order accepted hazardous substances for transport to the facility.

11. Based upon inspections performed at the site by the NJDEP and EPA between 1977 and 1984, sampling and chemical analyses, and environmental surveys conducted at the site, EPA has determined that the material which has been released, or threatens to be released, into the environment from spills and/or leaking containers at the site, contains hazardous substances, and that surface water, ground water, air and soil at the site have been or threaten to be contaminated. Specifically, analyses of waste samples performed during 1979 and a NJDEP site inspection report dated October 10, 1980 (which cites a June 1980 inventory of waste at the site) indicate the following wastes and/or constituents of waste were released or threatened to be released from the site: PCB-containing materials, acids, benzene, chloroform, trichloroethylene, toluene, styrene, xylenes, carbon tetrachloride, chloroethane, ethylbenzene, ethylacetate, isopropanol, methylene chloride, methyl ethyl ketone, methyl isobutyl ketone, phenolic resin, tetrachloroethane, tetrachloroethylene, trichloroethane, arsenic, mixed solvents, paint sludge and solvent sludge.

12. Based on the aforementioned inspections, sampling and chemical analyses, and environmental surveys, the New Jersey Supreme Court in October 1980 refused to stay the effectiveness of NJDEP's order that Scientific Chemical Processing, Inc. cease operations.

13. At that time, there were approximately 56 tanks and/or tank trailers and 50 drums containing hazardous substances at the site. According to an Inventory prepared by Scientific Chemical Processing, Inc., in December 1980, various wastes containing hazardous substances still remained at the site, including, but not limited to, solvents and thinners, etching solutions, methanol/phosphoric acid solutions, sodium sulfate solutions, and fuel residues. During 1984, many of the aforesaid tanks/tank trailers and drums were removed from the site by Inmar Associates, under NJDEP supervision. NJDEP reported that many were severely discolored, indicating leaks, and some of the tanks had makeshift patches.

14. At present, there are 4 tanks and 1 tank trailer remaining at the site. Lab analyses performed for Inmar Associates indicate that the liquids, solids, and/or sludges in these tanks/tank trailer contain PCBs. EPA has evidence of leaking, and some of the tanks are patched. There is no containment system in place around the tanks.

15. EPA has determined that many of the substances at the facility are hazardous substances, have been shown to cause a variety of adverse effects to exposed populations, and include known or suspected carcinogens and/or mutagens.

16. The presence of such hazardous substances at the site, and their past and/or potential future migration to surrounding soils, surface water, and groundwater, constitute an actual

release or threatened release from the facility within the meaning of Section 101(22) of CERCLA, 42 U.S.C. §6901 (22).

17. Based on present information, EPA has determined that:

(a) The site is located on a filled-in section of the Hackensack Meadows. The fill, which consists of organic silt, is underlain by clay deposits interspersed with beds of sand and gravel. These clay deposits, and sand and gravel beds are discontinuous and may not comprise a major confining unit. The bedrock at the site is the Brunswick Formation, which underlies the clay, sand and gravel deposits at depths ranging from approximately 40 to 120 feet in the vicinity of the site.

(b) The two major aquifers in the area of the site are the Brunswick Formation and the Quarternary age stratified drift located along river channels. The Brunswick Formation yields water from fractures in the rock. Fracturing decreases with depth, and most of the groundwater is produced by the upper, highly fractured part of the formation.

(c) There are approximately 21,000 people living within three miles of the site. The primary water supply for this population is groundwater. The nearest well is located about 4000 feet from the site.

(d) The hydrogeologic conditions described in paragraphs 17(a) and (b) constitute conditions which may enhance the vertical transmission of hazardous substances in the groundwater. The groundwater in the area is used by the local populations for drinking purposes.

18. Peach Island Creek borders the site on the north. This creek has been designated as Freshwater-2 (FW-2) by NJDEP. FW-2 criteria state that such waters should "be suitable for maintenance, migration, and propagation of the natural ecosystem and support biota." Peach Island Creek joins Berrys Creek Canal approximately 1500 feet northwest of the site. Berrys Creek Canal joins the Hackensack River approximately 2 miles downstream of its confluence with Peach Island Creek. The Hackensack River enters the Atlantic Ocean in the New Jersey Bay approximately 7 miles south of the site. Contamination of Peach Island Creek would pose a threat of contamination to these other navigable waters.

19. Visual observations by EPA and NJDEP of discoloration of and leachate seepage into Peach Island Creek noted during various site inspections indicate possible contamination of surface water, creek sediment, soil, and groundwater.

20. The site is on the National Priorities List ("NPL"), 40 CFR Part 300, Appendix B, which has been issued pursuant to Section 105(8)(b) of CERCLA, 42 U.S.C. §9605(8)(b).

21. In order to determine the nature and extent of the

release and threatened release at the site, and to select an appropriate remedial alternative, a remedial investigation and feasibility study (RI/FS) must be conducted in conformance with the National Contingency Plan, 40 CFR Part 300. The Work Plan submitted pursuant to paragraph 25, below, which will be appended hereto and labelled Appendix I upon approval by EPA, has been prepared by Respondents for use in performing the RI/FS.

22. The foregoing Findings and determinations have been made by EPA and are specifically denied by Respondents. Respondents deny that conditions at the Scientific Chemical Processing Carlstadt site or surrounding area present or may present an imminent and substantial endangerment to the public health, welfare, and/or the environment within the meaning of §106(a) of CERCLA. By consenting to this Order, or by taking any actions under this Order, Respondents do not concede the correctness of any fact alleged or validity of any legal finding or determinations asserted in the foregoing Findings or elsewhere in this Order. Neither this Order nor any action taken by Respondents pursuant to this Order shall constitute any evidence against Respondents, an admission of liability or responsibility by Respondents, a waiver by Respondents of any rights or defenses, nor an estoppel against Respondents with respect to any matter, act, claim, or thing related in any manner to the facility for any purpose other than in an action by EPA to enforce the terms of this Order. No payment(s) by Respondents pursuant to this Order, except for those under paragraph 31.C., below, shall be construed to be a fine, penalty, or monetary sanction. Nevertheless, Respondents agree not to contest the authority or jurisdiction of the Regional Administrator to issue this Order, and agree not to contest the validity or terms of this Order in any action brought by EPA to enforce the terms hereof.

#### DETERMINATION BY THE REGIONAL ADMINISTRATOR

23. Based on the above Findings, and the entirety of the administrative record, and pursuant to Section 106(a) of CERCLA, the Regional Administrator has determined that the release and threatened release of one or more hazardous substances from the facility may present an imminent and substantial endangerment to the public health, welfare and/or the environment.

#### ORDER

24. Based on the foregoing, it is hereby ordered and agreed that the Respondents shall undertake a remedial investigation and feasibility study at the facility in accordance with the requirements specified below. All activities performed pursuant to this Order shall be completed as soon as practicable even though time periods for their completion may be specified herein or in the Work Plan.

25. Remedial Investigation/Feasibility Study Work Plan

A. Respondents have submitted to EPA a work plan for the performance of a Remedial Investigation/Feasibility Study ("RI/FS Work Plan"). EPA has reviewed the RI/FS Work Plan for consistency with the National Contingency Plan, 40 CFR Part 300, EPA's "Guidance on Remedial Investigations Under CERCLA, May, 1985," and EPA's "Guidance on Feasibility Studies Under CERCLA, April, 1985." EPA has commented thereon in writing to Respondents, and Respondents have had an opportunity to meet with EPA and discuss such comments before they became final. Within 5 days of the effective date of this Order, Respondents shall amend the RI/FS Work Plan as required by those comments or as otherwise approved by EPA and submit the amended RI/FS Work Plan to EPA. EPA will make the final determination as to the sufficiency of the RI/FS Work Plan submitted by Respondents. At such time as EPA determines that the RI/FS Work Plan is acceptable, EPA will transmit to Respondents a written statement to that effect, and the RI/FS Work Plan will be appended to this Order and labelled Appendix I.

26. Remedial Investigation

A. According to the schedule presented in the EPA-approved RI/FS Work Plan ("the Work Plan") attached as Appendix I, Respondents shall submit to EPA for review and approval a detailed Site Operations Plan for the performance of a Remedial Investigation (RI) in conformance with the National Contingency Plan, EPA's "Guidance on Remedial Investigations Under CERCLA, May 1985," and the Work Plan of this Order. The Site Operations Plan shall fully describe how those activities called for in the Work Plan will be implemented, and shall include but should not necessarily be limited to the items in Task 2, Section 2.4.2. (Site Operations Plan) of the Work Plan and items i through x, below:

- i. a detailed map of the site depicting all sampling locations;
- ii. the number and types of samples to be obtained at each sampling location;
- iii. the overall management plan, including identification of contractors and subcontractors and their respective responsibilities for performance of the specific tasks set forth in Appendix I;
- iv. a detailed schedule for performance of the specific tasks;
- v. a Quality Assurance/Quality Control (QA/QC) plan for all investigations to be performed [the QA/QC plan shall be completed in accordance with Section 10 of the publication, Test Methods for Evaluating Solid Waste (SW-846) and

the guidance appended hereto and labelled Appendix II];

- vi. provision for completing a QA/QC evaluation of laboratory data (to validate the data) within 2 weeks of completion of laboratory analyses;
- vii. a description of the chain of custody procedures to be followed, which shall conform to those set forth in Section 1.3 of SW-846;
- viii. a Health and Safety plan;
- ix. a Contingency plan for conducting site activities; and
- x. the curriculum vitae of all professionals expected to perform the RI, and a description of the responsibilities and the anticipated levels of effort of each such professional.

B. EPA will review the Site Operations Plan and comment thereon in writing. EPA will address its comments to the conformance of the Site Operations Plan with sound management, engineering and scientific practices; technological feasibility; established environmental monitoring procedures; and consistency with the Work Plan. EPA will include in its comments an explanation of the basis of its comments. Within 5 business days of receipt of EPA's comments, Respondents will have an opportunity to meet with EPA to discuss such comments before they become final. Within 7 days of Respondents' receipt of the written final EPA comments, Respondents shall amend the Site Operations as required by those comments or as otherwise approved by EPA and submit the modified document to EPA.

C. EPA will make the final determination as to the sufficiency of the Site Operations Plan. At such time as EPA determines that the SOP is acceptable and in conformance with the NCP, EPA will transmit to Respondents a written statement to that effect.

D. Respondents shall perform the RI in conformance with the approved SOP and the Work Plan pursuant to the schedule set forth in the Work Plan. Respondents shall complete all activities specified therein and shall submit to EPA for review and approval a report detailing the results of the remedial investigation ("Preliminary RI Report").

E. EPA will review the Preliminary RI Report and comment thereon in writing; EPA will include an explanation of the basis of its comments. Within 5 business days of receipt of EPA's comments, Respondents will have an opportunity to meet with EPA to discuss such comments before they become final. Within 30 days of the receipt of such written final EPA comments, Respondents shall amend the said Report as required by those comments or as otherwise agreed upon by EPA, and shall promptly submit

the amended report to EPA ("the RI Report"). EPA may, if necessary to accomplish the goals of the RI/FS as stated in the approved Work Plan, require the performance of additional investigatory work consistent with the provisions of the National Contingency Plan and in conformance with a schedule to be set forth by EPA.

F. EPA will make the final determination as to the sufficiency of the RI Report and any additional studies. At such time as EPA determines that the RI Report is acceptable and in conformance with the NCP, EPA will transmit to Respondents a written statement to that effect.

## 27. Feasibility Study

A. Respondents shall perform a Feasibility Study in conformance with the following: National Contingency Plan, 40 CFR Part 300 (including 40 CFR 300.68(a) through (j)); EPA approved Work Plan (Appendix I), Section 3.0, Tasks 7-12; and EPA's "Guidance on Feasibility Studies Under CERCLA, April 1985."

B. Respondents shall perform the Feasibility Study (FS) in conformance with the Work Plan pursuant to the schedule set forth in the Work Plan. Respondents shall submit to EPA for review a Preliminary Feasibility Study Report which shall include a recommended remedial alternative. EPA will review and comment on the Preliminary FS Report.

C. Within 15 days of receipt of written final EPA comments on the Preliminary FS Report, Respondents shall modify that report as may be necessary to conform with such comments and submit the modified report to EPA for approval, and/or shall initiate such additional engineering evaluations as EPA finds necessary, in accordance with a schedule set forth by EPA. With the Preliminary FS Report, as amended, Respondents also shall submit a conceptual design for the recommended remedial action and the design shall conform to a format acceptable to EPA. The Preliminary FS Report, as amended, and the conceptual design for the recommended remedial action shall constitute the "Draft FS Report" for publication pursuant to paragraph 27.E., below.

D. EPA will make the final determination as to the sufficiency of the Draft FS Report submitted by Respondents. At such time as EPA determines that the Draft FS Report is sufficient, and acceptable for publication pursuant to Paragraph 27.E., below, EPA will transmit to Respondents a written statement to that effect.

E. Following submittal of the Draft FS Report, EPA will announce the availability of both the RI Report and the Draft FS Report to the public for review and comment. Following the public comment period (which may include both written and oral comments), EPA will determine if the Reports should be modified

or accepted as submitted, and will so notify Respondents in writing. Within 5 business days of EPA's written determination, Respondents will have an opportunity to meet with EPA to discuss such modifications. Unless otherwise approved by EPA, within 30 days of receipt of EPA's written determination that either the RI Report or the Draft FS Report should be modified, Respondents shall modify either or both of the reports (which may, inter alia, entail a change in the recommended remedial alternative) as directed by EPA or as otherwise approved by EPA, and submit the modified document(s) to EPA. Should EPA require any modification(s), Respondents reserve their right to comment on, or disagree with these modifications. Respondents' comments on any EPA modification(s) shall be set forth in footnotes in or an appendix to the modified document. EPA regulations, policy and guidance in effect at the time such public comment period is initiated shall govern the procedures to be followed. EPA will make the final determination in any dispute regarding the sufficiency of the RI Report and the FS Report.

F. The Final FS Report shall not select a remedial alternative. EPA will make the final selection of the remedial alternative(s) to be implemented.

#### 28. Sampling and Reporting

A. Upon request by EPA, Respondents shall provide EPA or its designated representatives with a reasonable number of duplicate and/or split samples of any samples collected in furtherance of work performed in accordance with this Order.

B. The Respondents shall provide monthly written progress reports to EPA. At a minimum, these progress reports shall: (1) describe all actions and activities undertaken toward achieving compliance with this Order, and (2) include all plans and procedures completed subsequent to EPA approval of the RI/FS Work Plan, during the past month as well as such actions and plans which are scheduled for the next month. These reports are to be submitted to EPA by the tenth day of each month following the effective date of this Order.

C. Upon request by EPA, all data and information, including raw sampling and other monitoring data, generated pursuant to this Order by Respondents or on behalf of Respondents, shall immediately be made available to EPA or its designated representatives.

D. Respondents shall give EPA four (4) business days advance notice of the following expected activities under this Order: all monitoring well activities, including but not limited to drilling, installation and testing, and all on-site and off-site sampling activities.

E. EPA and the Respondents agree that each shall preserve, during the pendency of this Order and for a minimum of six (6)

years after its termination, all data, records and documents in their possession or in the possession of their divisions, employees, agents, accountants, contractors, or attorneys, concerning the implementation of work under this Order, despite any document retention policy to the contrary. No data, information, or records shall be destroyed for six years after the termination of work under this Order without either the express written approval of EPA, or a written offer by Respondents to provide such material to EPA followed by EPA's written rejection of that offer. After this six year period, the Respondents shall notify EPA within 30 days prior to the destruction of any such documents. Upon request by EPA, the Respondents shall make available to EPA such records or copies of any such records unless otherwise privileged under law.

F. All records prepared or compiled by Respondents and delivered to EPA in the course of implementing this Order shall be available to the public unless identified as confidential by a Respondent in conformance with 40 CFR Part 2. Records so identified shall be treated as confidential only in accordance with the applicable confidentiality regulations. Sampling and other monitoring data, and hydrological and geological information, may not be considered confidential. Furthermore, it is understood by the parties that EPA may release all such records to the NJDEP.

G. The original and nine copies of all correspondence, reports, work plans and other writings required under the terms of this Order to be submitted to EPA shall be sent by certified mail, return receipt requested to:

Chief, Site Investigation and Compliance Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10278

Attention: SCP-Carlstadt Project Officer

One copy of all such writings shall be transmitted by certified mail, return receipt requested to:

Chief, Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Room 437  
26 Federal Plaza  
New York New York 10278

Attention: SCP-Carlstadt Site Attorney

29. EPA Communications and Decisions

A. Written communications from EPA to Respondents will be sent by certified mail, return receipt requested to:

Respondents' Facility Coordinator  
(address to be determined)

Thomas M. Armstrong, Counsel  
Corporate Environmental Programs  
General Electric Company  
3135 Easton Turnpike-W1A  
Fairfield, CT 06431.

B. As appropriate during the course of implementation of the remedial actions under this Order, Respondents or their consultants or contractors, acting through the Facility Coordinator, may confer with the EPA concerning those actions. Based upon new circumstances or new information not in the possession of EPA on the date of this Order, the Facility Coordinator may request, in writing to EPA, approval of a modification of the EPA-approved Work Plan. If approved by the EPA, such modifications shall be implemented immediately by Respondents.

C. All decisions of EPA under this Order, including approvals; disapprovals; grants or denials of requests for extensions of time; and requests for modifications of reports, work plans, specifications, schedules and other work outputs will be communicated in writing to Respondents by the Chief, Site Investigation and Compliance Branch, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York 10278.

D. No informal advice, guidance, suggestions or comments by EPA or NJDEP regarding reports, plans, specifications, schedules or any other writings submitted by Respondents shall be construed as relieving Respondents of their obligation to obtain such formal approvals as may be required by this Order. However, oral approvals may be obtained for minor matters if they are confirmed in writing within 2 business days.

30. Respondents' Facility Coordinator  
and EPA Inspection Authority

A. Within 15 days of the effective date of this Order, Respondents shall provide EPA with the name, title, address, phone number and qualifications of their designated Facility Coordinator, who shall be responsible for oversight of the implementation of this Order, including all activities required herein. The Facility Coordinator shall have technical expertise sufficient to adequately oversee all aspects of the work contemplated by this Order. All correspondence and other writings from EPA to Respondents shall be made available to the Facility Coordinator. Counsel for Respondents shall not be

eligible to be Facility Coordinator. Respondents shall have the right to change their Facility Coordinator at any time. However, Respondents shall notify EPA in writing at least five (5) working days prior to any such change. If such advance notice is not feasible, notice shall be given by the best means and as far in advance as possible under the circumstances.

B. EPA and EPA's representatives, including but not limited to their employees, agents, contractors and consultants, shall have authority to observe the work being carried out pursuant to this Order, for the purposes of inspecting and observing Respondents' progress in implementing the requirements of this Order, or for the purpose of verifying the data submitted to EPA by Respondents concerning such implementation. To the maximum extent possible under the law, Respondents shall forthwith honor all requests by EPA or its representatives to observe the work being carried out pursuant to this Order and also, at reasonable times, shall permit such persons to inspect and copy all writings, including all data, in any way pertaining to work undertaken pursuant to this Order. Respondents shall not be required to permit anyone who is not bound by EPA's confidentiality regulations to inspect or copy any writing which is entitled to confidential treatment under Title 40 CFR Part 2. Notwithstanding the above, EPA hereby retains all its inspection authority under CERCLA and the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq. NJDEP and its designated representatives, as well as any EPA contractor and its representatives, shall be eligible to be designated representatives of EPA under this paragraph.

C. Respondents shall not interfere with EPA access to the Site or any other premises upon which work under this Order may be performed. Further, to the extent practicable and within their rights and abilities to do so, (including bringing the terms of this paragraph to the attention of their selected contractors) Respondents shall support and assist EPA in obtaining access to the site and other premises at which work in furtherance of the requirements of this Order is carried out, and shall similarly support and assist EPA in exercising its inspection and other authority under this provision including, but not limited to review and copying of records.

### 31. Enforcement Actions

A. In the event that Respondents fail to adhere to any requirement of this Order; or, notwithstanding compliance with the terms of this Order, upon the occurrence or discovery of a situation as to which EPA would be empowered to take any further response action(s), including but not limited to the prevention or abatement of an imminent and substantial endangerment to the public health, welfare or the environment arising from conditions at the facility; or under any other circumstances authorized by law and not inconsistent with terms of this Order, EPA reserves the right to, after notice to Respondents and other identified potentially responsible parties, institute federally-funded

response activities and subsequently pursue cost recovery actions available, and/or EPA may issue orders to Respondents pursuant to available statutory authority. Respondents do not hereby consent to any future action taken by EPA under this paragraph.

B. EPA reserves its right to bring an action against Respondents pursuant to Section 107 of CERCLA, 42 U.S.C. §9607, for recovery of any costs incurred in oversight of Respondents' implementation of this Order, and any other costs incurred by EPA in connection with investigative or response activities at the Site (to include all costs associated with EPA's performance of the RI/FS or any part thereof, in the event that Respondents fail to complete the RI/FS in conformance with the requirements of this Order).

C. If Respondents fail, without prior EPA approval (which shall not be unreasonably withheld) to conform with the requirements set forth in paragraphs 25, 26, and 27 of this Order by the time periods specified therein (unless caused by a force majeure event as defined in paragraph 32.H, below), Respondents shall each make payments to the EPA in the amount indicated below for each day of noncompliance:

<u>Days After Required Date</u>	<u>Stipulated Penalties</u>
0-5	\$ 0 for each day
6-10	\$ 250 for each day
11-20	\$ 500 for each day
greater than 21	\$ 1000 for each day

After 30 consecutive days of noncompliance, EPA reserves the right to pursue civil penalties of up to \$5000 per day pursuant to Section 106(b) of CERCLA, in lieu of these stipulated penalties. Any such penalty shall be due and payable ten days following receipt of a written demand by EPA describing the basis for the penalties. Payment of such stipulated civil penalties shall be made by cashier's or certified check payable to the "Hazardous Substances Response Trust Fund", and mailed to the following address with a notation of the docket number of this Order: EPA - Superfund, P.O. Box 371003M, Pittsburgh, Pennsylvania 15251. A copy of EPA's demand letter shall accompany the payment; a copy of the transmittal letter shall be sent to the Chief, Site Investigation and Compliance Branch, EPA, Region II.

D. Notwithstanding any other provision of this Order, EPA reserves the power to take enforcement actions for any violation of law or this Order (except that EPA may, instead, elect to continue the imposition of stipulated penalties pursuant to paragraph 31.C, above). Failure to comply with this Order, or

any portion hereof without sufficient cause may subject Respondents to an action under Section 107(c)(3) of CERCLA, 42 U.S.C. §9607(c)(3), for punitive damages in the amount of three times the total of all costs incurred by the government as a result of Respondents' failure to take proper action.

### 32. General Provisions

A. This Order shall be effective on the next working day following the date on which it is signed by the Regional Administrator.

B. All work conducted pursuant to this Order shall be performed in accordance with prevailing professional standards.

C. All actions performed by Respondents in implementing this Order shall be in compliance with all applicable federal, state, and local laws and regulations, including but not limited to 40 CFR, Part 300. Respondents shall be responsible for obtaining all necessary permits, licenses and other authorizations.

D. The Work Plan, Site Operations Plan, the RI Report and the Draft FS Report, in addition to all other reports, work plans and other writings required under the terms of this Order, upon approval by EPA, are incorporated into this Order.

E. Neither the United States Government nor any agency thereof shall be liable for any injuries or damages to persons or property resulting from acts or omissions of Respondents, their officers, directors, employees, agents, servants, receivers, trustees, successors, or assignees, or of any persons, including but not limited to firms, corporations, subsidiaries, contractors or consultants, in carrying out activities pursuant to this Order, nor shall the United States Government or any agency thereof be held out as a party to any contract entered into by Respondents in carrying out activities pursuant to this Order.

F. This Order shall apply to and be binding upon Respondents and Respondents' heirs, successors, and assigns.

G. Nothing contained in this Order shall affect any right, claim, interest, defense, or cause of action of any party hereto with respect to third parties.

H. Respondents' activities under this Order shall be performed within the time limits set forth herein unless performance is delayed by events which constitute a force majeure. For purposes of this Order, a force majeure is defined as any event arising from causes beyond Respondents' control. Increased costs or changed financial circumstances shall not be considered a force majeure. Respondents shall verbally notify

EPA's designated representative and EPA's project coordinator as soon as possible following Respondents' awareness that circumstances constituting a force majeure have occurred or are likely to occur. If the designated representative or the project coordinator cannot be contacted, Respondents shall attempt to leave a message at the office of each person who could not be contacted. In addition, Respondents shall notify EPA in writing, over the signature of a responsible official of Respondents, as soon as possible but not later than ten (10) days after Respondents become aware that circumstances constituting a force majeure have occurred. Respondents shall have the burden of proving that any failure to comply with any requirement of this Order is excused by this paragraph. Respondents' failure to timely notify EPA as required by this subparagraph shall render the remaining provisions of this subparagraph null and void insofar as they may entitle Respondents to an extension of time, (unless EPA in fact had actual knowledge of such circumstances).

I. Respondents shall use their best efforts to avoid or minimize any delay or prevention of performance of their obligations under this Order. Respondents shall provide written notification to EPA of any circumstances which have caused or which Respondents believe are likely to cause a delay of performance. Such written notice: 1) shall be provided as soon as possible, but not later than ten (10) days after the date when Respondents knew or should have known of the occurrence of such circumstances; 2) shall be accompanied by all available documentation, including but not limited to third-party correspondence; and 3) shall include a) a description of the circumstances causing or potentially causing the delay; b) the actions (including pertinent dates) that Respondents have taken and/or plans to take to minimize any delay; and c) the date by which or time period within which Respondents propose to complete delayed activities. Such notification does not relieve the Respondents of any obligation under this Order.

J. Nothing contained in this Order shall affect any right, claim, interest, defense, or cause of action of any party hereto with respect to third parties. Nothing in this Order constitutes a decision on pre-authorization of funds under Section 111(a)(2) of CERCLA.

K. Nothing in this Order shall be construed as any determination by EPA or by any of the parties consenting hereto as to the appropriate degree of relative contribution among them in the performance of this Order, or with respect to any other matter arising out of the operations of the facility, or with respect to any indemnity obligations as between Owner/Operator Respondents and other Respondents, or as a waiver of any rights of contribution and indemnity as among the parties.

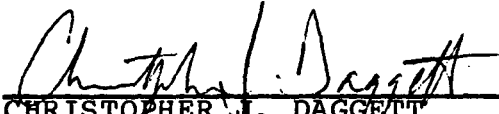
### 33. Termination and Satisfaction

The provisions of this Order shall be deemed satisfied

upon the Respondents' receipt of written notice from EPA that the Respondents have demonstrated, to the satisfaction of EPA, that all of the terms of this Order, including any additional tasks which EPA has determined to be necessary (refer to paragraph 26.E., above), have been completed.

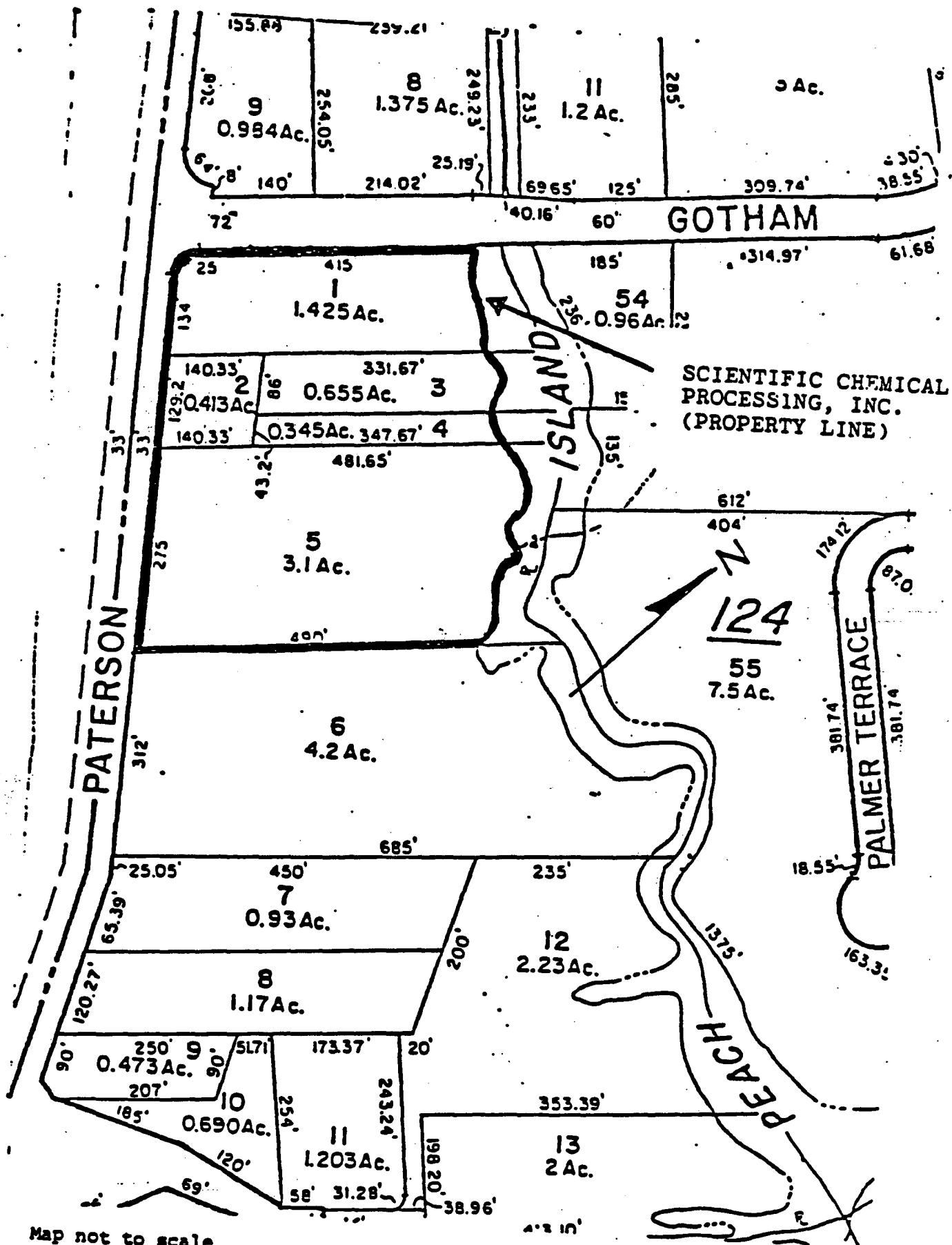
IT IS SO ORDERED:

U.S. ENVIRONMENTAL PROTECTION AGENCY



CHRISTOPHER J. DAGGETT  
Regional Administrator  
U.S. Environmental Protection Agency  
Region II

SEPTEMBER 30, 1985  
DATE



SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Air Products and Chemicals, Inc.COMPANY  
NAME OF OFFICIAL

James H. Agger

Vice President and General CounselTITLESeptember 19, 1985DATEStephen S. Ferrara (215) 481-7352TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

Law Department

P.O. Box 538

Allentown, PA 18105

✓  
T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Allied Corporation

COMPANY

NAME OF OFFICIAL

William M. Reiter

Director - Pollution Control

TITLE

DATE

9/18/85

Kenneth E. Stroup, Jr., Esq.

(201) 455-3455

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

*KES  
Law Firm*

T. M. ARMSTRONG

SEP 20 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AMERICAN CAN COMPANY

COMPANY

JOHN HIRSCHAUER

NAME OF OFFICIAL

DIRECTOR, LEGAL ADMINISTRATION

TITLE

SEPTEMBER 20, 1985

DATE

203-552-3625

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

**T. M. ARMSTRONG** ✓

**SEP 23 1985**

**CONSENT**

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Cyanamid Company (including  
~~Lederle Laboratories and Shulton Inc.~~)  
COMPANY

  
NAME OF OFFICIAL R. B. Johnson

President, Lederle Laboratories  
TITLE

September 19, 1985  
DATE

Margaret R. Tribble 201-831-3641  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.

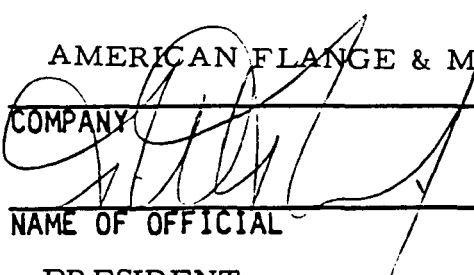
b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AMERICAN FLANGE & MANUFACTURING CO, II  
COMPANY  
  
NAME OF OFFICIAL  
PRESIDENT  
TITLE  
SEPTEMBER 23, 1985  
DATE

ROBERT M. HALLMAN (212) 701-3680  
TELEPHONE NUMBER AND NAME OF

I. M. ARMSTRONG

SEP 23 1985 ✓

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Hoechst Corporation

COMPANY

Heinz K. Hopmeister  
NAME OF OFFICIAL

Group Vice President

TITLE

September 16, 1985

DATE

Kip C. Lubcke, Esq.

(201) 231-3089

TELEPHONE NUMBER AND NAME OF

## CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

~~American Inks & Coatings Corporation~~  
~~COMPANY~~

  
NAME OF OFFICIAL

President  
TITLE

September 19, 1985  
DATE

215-933-5848 - Mr. Eugene H. Buttle, Pres.  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).

3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

American Standard Inc.

COMPANY

John F. Geer

NAME OF OFFICIAL

Vice President, General Counsel &  
TITLE Secretary

September 19, 1985

DATE

Charles Gordon (212) 703-5147

TELEPHONE NUMBER AND NAME OF

T. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Armstrong World Industries, Inc.

COMPANY

NAME OF OFFICIAL

Group Vice-President

Floor Products Operations

TITLE

September 20, 1985

DATE

717/396-2577

David D. Wilson, Attorney

TELEPHONE NUMBER AND NAME OF

COMPANY CONTACT PERSON

✓  
T. M. ARMSTRONG

CONSENT

SEP 20 1985

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:

- a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
- b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).

2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).


3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.

4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.

5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

Ashland Chemical Company,  
Division of Ashland Oil, Inc.

COMPANY

  
NAME OF OFFICIAL

Administrative Vice President

TITLE

September 18, 1985

DATE

Stephen W. Leermakers (606) 268-7434

TELEPHONE NUMBER AND NAME OF

L. M. ARMSTRONG

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

AT&T TECHNOLOGIES, INC.

COMPANY

D. R. Chittick  
NAME OF OFFICIAL D. R. CHITTICK

ENGINEERING VICE PRESIDENT  
TITLE

09/20/85  
DATE

(201) 953-5230 JOHN A. MCKINNEY, JR.

TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

RASF WYANDOTTE CORPORATION  
COMPANY

DAVID P. SCHNEIDER  
NAME OF OFFICIAL

ATTORNEY  
TITLE

SEPTEMBER 23, 1985  
DATE

DAVID P. SCHNEIDER (201)-263-396  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON

SEP 23 1985

CONSENT

The Respondent identified below hereby consents to the issuance of this Order and to its terms, subject to the following conditions:

1. This consent shall be effective and binding upon the undersigned Respondent if and only if both of the following two conditions are met:
  - a. At least sixty-five (65) Respondents execute the within Administrative Order on Consent by the deadline set by the EPA or any extension of the deadline not to exceed 14 days from September 23, 1985.
  - b. The Respondents executing the within Consent Order in combination represent at least sixty percent (60%) of all units shown on and as determined by reference to Exhibit A attached hereto (see paragraph 3 below).
2. It is agreed by and between the EPA and Respondent that Exhibit A is attached hereto solely for the purpose set forth above and for no other reason, that Attachment A does not purport to be a complete or accurate list of material volumes attributable to the Respondents or sent to the Carlstadt site, and no other weight or significant, evidentiary or otherwise, whatsoever will be given to Attachment A (see paragraph 3 below).
3. In lieu of submission of Attachment A to the EPA, Respondent authorizes Thomas M. Armstrong or his designee on the Carlstadt Steering Committee to certify to the EPA compliance or non-compliance with paragraph 1b above.
4. In the event that both conditions set forth above are not met then this consent shall be null and void and of no effect or consequence, evidentiary or otherwise.
5. Neither this consent, any action taken by Respondent pursuant to this Order shall constitute or be used as evidence of any admission of law or fact against Respondent.

BEE CHEMICAL COMPANY, a subsidiary of  
MORTON THIOKOL, INC., named in the  
Administrative Order and Consent as  
COMPANY BEE CHEMICAL CORPORATION,

BY:

  
NAME OF OFFICIAL S. J. STEWART

Vice President

TITLE

September 18, 1985

DATE

Daniel Boone, Jr. (312) 807-2432  
TELEPHONE NUMBER AND NAME OF  
COMPANY CONTACT PERSON